

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

vs.

STEFAN QIN, VIRGIL TECHNOLOGIES  
LLC, MONTGOMERY TECHNOLOGIES  
LLC, VIRGIL QUANTITATIVE  
RESEARCH, LLC, VIRGIL CAPITAL LLC,  
and VQR PARTNERS LLC,

Defendants.

Case No.: 20-cv-10849 (JGLC)

**DECLARATION OF MARK PORTER IN SUPPORT OF  
RECEIVER'S MOTION TO COMPEL TURNOVER OF ASSETS**

Mark Porter, pursuant to 28 U.S.C. § 1746, declares the following:

**I. INTRODUCTION**

1. I am a Director in the Risk, Forensics, & Compliance group at Ankura Consulting Group, LLC (“Ankura”), which provides forensic accounting and analysis services to the Receiver, Robert A. Musiala, Jr. (“Receiver”), in the above-captioned matter. Since February 4, 2021, Ankura has been engaged by the Receiver to assist with its investigation. I submit this Declaration in support of the Receiver’s Motion to Compel Turnover of Assets.

2. I am a citizen of and reside in the United States of America.

3. I am a seasoned forensic accountant with more than six years of experience in fraud and accounting irregularity investigations, forensic accounting, asset tracing, and other related services for both traditional and digital financial instruments. I am also well-versed in

conducting tracing analyses involving cryptocurrencies. *See* C.V. of Mark Porter, a true and correct copy of which is attached hereto as **Exhibit 1**.

**A. Tracing Support and Methodology**

4. To support this Declaration, I have reviewed numerous documents, communications, bank statements, and cryptocurrency transactional records that relate to or directly involve Binance Holdings, Ltd. (“Binance”), Phuong Nguyen (“Nguyen”), Nasir Adaya (“Adaya”), Stefan Qin (“Qin”), Virgil Sigma Fund, LP (“Sigma Fund”), and Virgil Quantitative Research, LLC (together with its predecessor Decibel18 LLC, “VQR”).

5. To conduct the tracing analysis, I applied a Last In First Out (“LIFO”) tracing methodology. Commonly used to trace assets, the LIFO methodology adheres to Generally Accepted Accounting Principles (“GAAP”) and is widely accepted by courts. The LIFO methodology employs a cost flow assumption in which any payments or withdrawals from the account is assumed to be funded by the money most recently deposited into the account. A subsequent payment or withdrawal from the account would thus be assumed to be funded by the second-most recent deposit of funds into the account. This assumption continues until all funds in the account have been exhausted. My tracing analysis applies the LIFO methodology to trace both fiat and cryptocurrency.

**B. Summary of Disputed Assets**

6. Between March 2019 and January 2021, Adaya diverted approximately \$3.5 million dollars’ worth of digital assets (“Disputed Assets”) from the Receivership Estate<sup>1</sup> to two accounts that he controlled: (i) a Binance account registered under the name of Nguyen

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<sup>1</sup> “Receivership Estate” is defined as “all property interests of the Receivership Entities and all other Recoverable Assets, including, but not limited to, monies, funds, securities, digital assets, credits, effects, goods, chattels, lands, premises, leases, claims, rights, and other assets, together with all rents, profits, dividends, interest, or other income attributable thereto, of whatever kind, which the Receivership Entities own, possess, have a beneficial interest in, or control directly or indirectly.” Order Appointing Receiver, *SEC v. Qin*, (Jan. 21, 2021) ECF 31, at ¶ 7.A..

(“Nguyen Account”)<sup>2</sup> and (ii) an unhosted bitcoin (“BTC”) wallet address ending in “vwca” (“Adaya BTC Wallet”).<sup>3</sup>

7. The Disputed Assets consist of (a) approximately \$3 million dollars’ worth of digital assets that are traceable to (i) Sigma Fund investors (“Sigma Assets”) and (ii) VQR-owned and -controlled exchange accounts (“VQR Assets”) and (b) 20.03 bitcoin (“BTC”).

8. At a high level, the Sigma Assets can roughly be traced from the Receivership Estate to Adaya in six steps:

- (a) Step 1: Fiat currency was deposited by Sigma Fund investors into one of two accounts at Commonwealth Bank of Australia (“CBA”) registered in the name of Virgil Capital Pty Ltd. (the predecessor to Virgil Capital LLC, Sigma Fund’s General Partner), which Qin controlled and continued to use to accept investor funds for purported investment into the Sigma Fund — an account ended in x2114 and an account ended in x0146 (“Virgil CBA x2114” and “Virgil CBA x0146,” respectively, and, together, the “Virgil CBA Accounts”);
- (b) Step 2: The fiat currency was then transferred to one of two personal bank accounts in Qin’s name: a Chase Private Client Account ending in x7059 (“Qin Chase Account”) and a CBA account ending in x8375 (“Qin CBA Account” and, together with the Qin Chase Account, “Qin Personal Accounts”);
- (c) Step 3: The fiat currency was then transferred to one of three over-the-counter (“OTC”) trading desks<sup>4</sup> — QCP Capital Pte Ltd. (“QCP Capital”); Galois Capital Alpha Fund, LP (“Galois”); and OS Limited (“OSL”)—where it was converted into

<sup>2</sup> The Nguyen Account refers to Binance master account with User ID ending in 8310 and its related sub-accounts. Pursuant to Federal Rule of Civil Procedure 5.2, redactions have been applied throughout this Declaration and the attached exhibits to protect confidential personal and financial information.

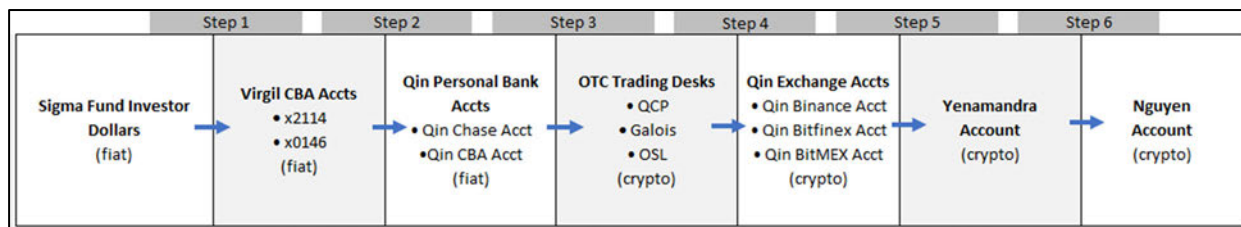
<sup>3</sup> A wallet address is an alphanumeric string from and to which cryptocurrencies can be sent. It can be shared with different contacts like an email address. Coinbase, *Help: Wallet Address*, <https://help.coinbase.com/en/coinbase/getting-started/crypto-education/glossary/wallet-address> (last accessed on June 23, 2023). A wallet can be hosted or unhosted. A “hosted” wallet is one in which the funds contained within are controlled and custodied by a financial institution known as an “exchange” such as Coinbase or Binance. Conversely, an “unhosted” wallet is one in which the funds contained within are controlled and custodied by the user directly. Unhosted wallets may be accessed using software applications, including Metamask, Electrum, or MyEtherWallet (“MEW”). See Requirements for Certain Transactions Involving Convertible Virtual Currency or Digital Assets, 85 Fed. Reg. 83840 (Dec. 23, 2020) (amending 31 C.F.R. §§ 1010, 1020, and 1022), available at <https://www.govinfo.gov/content/pkg/FR-2020-12-23/pdf/2020-28437.pdf>.

<sup>4</sup> In traditional finance, OTC is the process of trading securities via a broker-dealer network as opposed to on a centralized exchange (such as the New York Stock Exchange). Chris Murphy, *What Is Over-the-Counter (OTC)?*, INVESTOPEDIA (Apr. 24, 2023), <https://www.investopedia.com/terms/o/otc.asp>. In cryptocurrency, an OTC desk is a third-party entity that helps to facilitate a direct trade between parties without the need for a centralized exchange. OTC desks are usually used to purchase large quantities of an asset in order to improve transparency, save time and fees, and to maintain security of the asset purchased. *Over-the-Counter (OTC) Trading*, CRYPTOPEDIA, [https://www.gemini.com/cryptopedia/search?query=Over-the-Counter%20\(OTC\)%20Trading](https://www.gemini.com/cryptopedia/search?query=Over-the-Counter%20(OTC)%20Trading).

cryptocurrency (QCP Capital, Galois, and OSL may collectively be referred to as “OTC Trading Desks”);

- (d) Step 4: The resultant cryptocurrency was then transferred to one of three cryptocurrency exchange accounts in Qin’s name — an account on Binance (“Qin Binance Account”)<sup>5</sup>; an account on Bitfinex (“Qin Bitfinex Account”); and an account on BitMEX (“Qin BitMEX Account”) (the Qin Binance Account, Qin Bitfinex Account, and Qin BitMEX Account may collectively be referred to as “Qin Exchange Accounts”);
- (e) Step 5: The cryptocurrency was then transferred from Qin Exchange Accounts to a Binance account registered in the name of Srihari Yenamandra (“Yenamandra Account”)<sup>6</sup> and controlled by Adaya;<sup>7</sup> and
- (f) Step 6: After being traded extensively for and commingled with other assets, the resultant cryptocurrency (and proceeds thereof) was transferred from the Yenamandra Account to the Nguyen Account.

The diagram below summarizes this tracing:



9. At a high level, the VQR Assets can be traced from the Receivership Estate to Adaya in four steps as follows:

- (a) Step 1: Cryptocurrency tokens were deposited into and subsequently traded within an account on Binance controlled by VQR (“VQR Binance Account” – which consists of the master account (“VQR Binance Master Account”)<sup>8</sup> and its related subaccount (“VQR Binance Sub-Account”);<sup>9</sup>
- (b) Step 2: Certain trading proceeds were then transferred from the VQR Binance Account to one of two unhosted wallets controlled by Adaya: a wallet ending in “Deefa” (“Deefa Wallet”) and Adaya BTC Wallet (and together with the Deefa Wallet, “Adaya Wallets”);

<sup>5</sup> The Qin Binance Account refers to the master account with a User ID ending in 3517 and all related subaccounts.

<sup>6</sup> The Yenamandra Account refers to the master account with a User ID ending in 9897 and all related subaccounts.

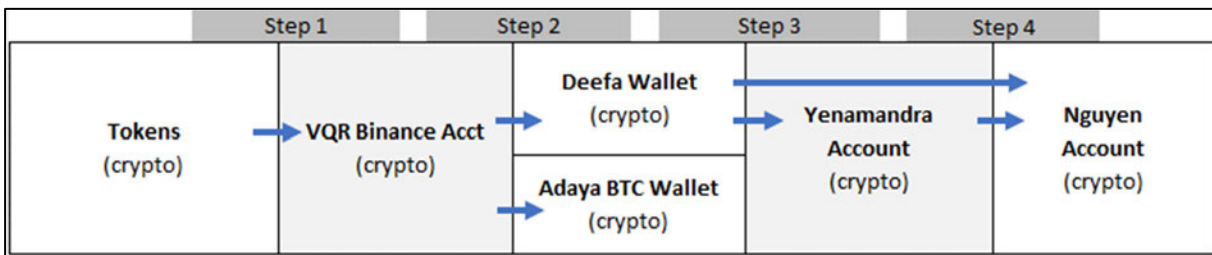
<sup>7</sup> Transcript of Dep. of Nasir Adaya, Mar. 7, 2023, 143:14-144:17, attached as Exhibit 2 to Molina Decl.

<sup>8</sup> The VQR Binance Master Account refers to the master account with a User ID ending in 4083.

<sup>9</sup> The VQR Binance Sub-Account refers to an account with a User ID ending in 5275.

- (c) Step 3: The proceeds were then transferred from the Deefa Wallet to the Yenamandra Account and Nguyen Account; and
- (d) Step 4: After additional and extensive trading for and commingling with other assets, the proceeds from the Yenamandra Account were ultimately transferred to the Nguyen Account.

The diagram below summarizes this tracing:

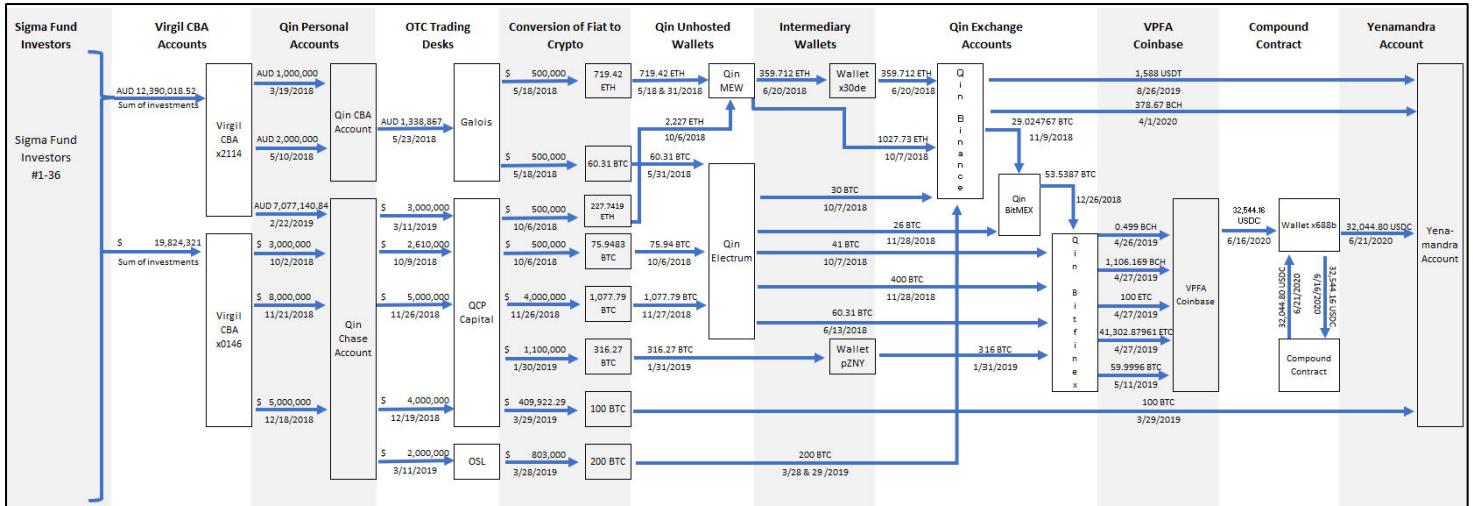


## II. THE SIGMA ASSETS

10. The Sigma Assets refer to four sets of tokens transferred from the Receivership Estate to Adaya as follows: (a) Tranche 1: 1,588.88 Tether (“USDT”) and Tranche 2: 378.67 Bitcoin Cash (“BCH”), transferred from the Qin Binance Account to the Yenamandra Account on August 26, 2019 and April 1, 2020, respectively; (b) Tranche 3: 100 BTC transferred from QCP Capital to the Yenamandra Account on March 30, 2019; and (c) Tranche 4: 32,044.80 USD Coin (“USDC”) transferred from a Coinbase exchange account registered in the name of VPFA Ltd., a BVI entity wholly owned by Qin whose portfolio was managed by VQR (“VPFA Coinbase Account”), to the Yenamandra Account on June 16, 2020.

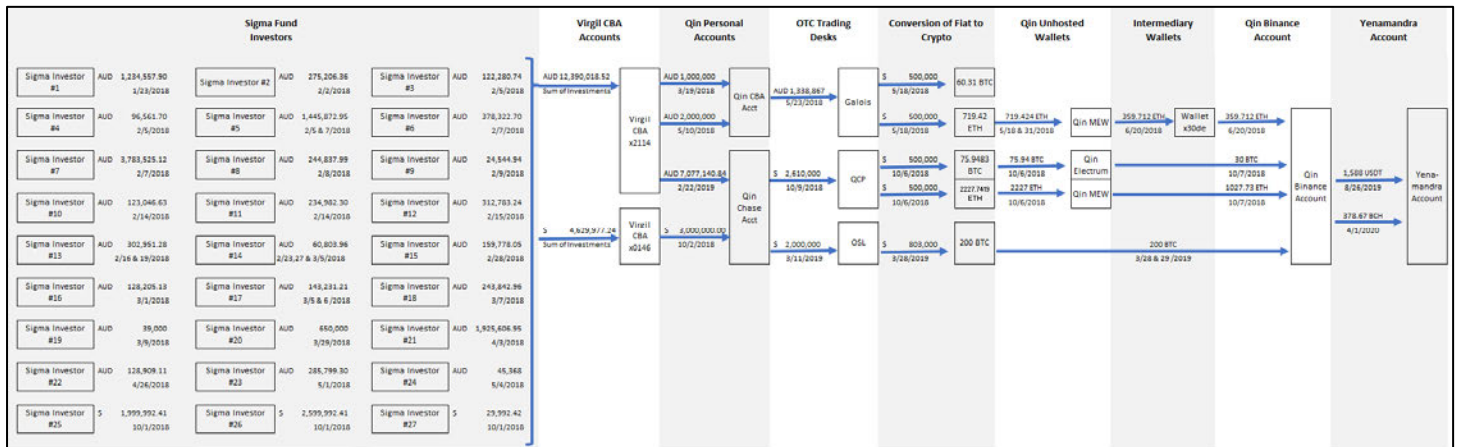
11. The Sigma Assets were then commingled with, and traded extensively at a high frequency for, other digital assets within the Yenamandra Account. *See* ¶40, *infra*, showing that approximately 4,000 trades occurred within the Yenamandra Account during the time period in question. In January 2021, the balance of the Yenamandra Account was withdrawn and subsequently transferred to the Nguyen Account. *See* ¶¶ 116-118, *infra*.

12. As explained in ¶8 *supra*, and, as will be detailed in each of the tracing analyses in ¶¶ 13-99, *infra*, the Sigma Assets that were transferred to Adaya can each be traced back to initial deposits of Sigma Fund investor dollars. The diagram below summarizes the tracing of the Sigma Assets from Sigma Fund investor deposits into the Virgil CBA Accounts to the Yenamandra Account.



### A. Tranches 1 & 2: 1,588.88 USDT and 378.67 BCH

13. The diagram below illustrates the tracing of Tranches 1 & 2 from the Sigma Fund investors to the Yenamandra Account. The tracing analysis follows in ¶¶ 14-36, *infra*.





1. Step 1: Sigma Fund Investor Dollars Were Deposited Into the Virgil CBA Accounts

14. The diagram below summarizes the deposits of Sigma Fund investor dollars. The tracing analysis follows in ¶15, *infra*.

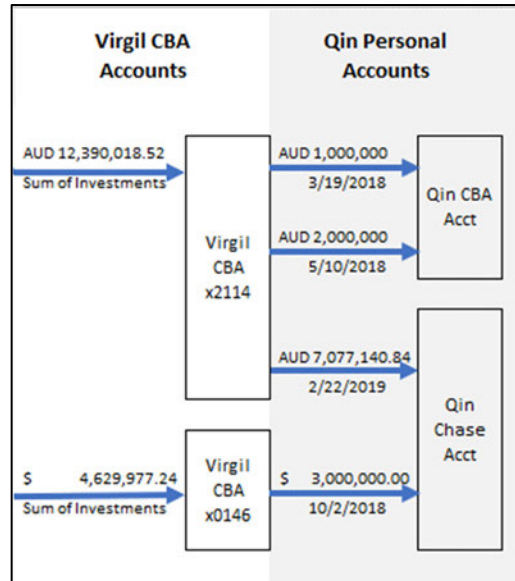
Sigma Fund Investors						Virgil CBA Accounts	
Sigma Investor #1	AUD	1,234,557.90	1/23/2018	Sigma Investor #2	AUD	275,206.36	2/2/2018
Sigma Investor #3	AUD	122,280.74	2/5/2018	Sigma Investor #4	AUD	96,561.70	2/5/2018
Sigma Investor #5	AUD	1,445,872.95	2/5 & 7/2018	Sigma Investor #6	AUD	378,322.70	2/7/2018
Sigma Investor #7	AUD	3,783,525.12	2/7/2018	Sigma Investor #8	AUD	244,837.99	2/8/2018
Sigma Investor #9	AUD	24,544.94	2/9/2018	Sigma Investor #10	AUD	123,046.63	2/14/2018
Sigma Investor #11	AUD	234,982.30	2/14/2018	Sigma Investor #12	AUD	312,783.24	2/15/2018
Sigma Investor #13	AUD	302,951.28	2/16 & 19/2018	Sigma Investor #14	AUD	60,803.96	2/23, 27 & 3/5/2018
Sigma Investor #15	AUD	159,778.05	2/28/2018	Sigma Investor #16	AUD	128,205.13	3/1/2018
Sigma Investor #17	AUD	143,231.21	3/5 & 6/2018	Sigma Investor #18	AUD	243,842.96	3/7/2018
Sigma Investor #19	AUD	39,000	3/9/2018	Sigma Investor #20	AUD	650,000	3/29/2018
Sigma Investor #21	AUD	1,925,606.95	4/3/2018	Sigma Investor #22	AUD	128,909.11	4/26/2018
Sigma Investor #23	AUD	285,799.30	5/1/2018	Sigma Investor #24	AUD	45,368	5/4/2018
Sigma Investor #25	\$	1,999,992.41	10/1/2018	Sigma Investor #26	\$	2,599,992.41	10/1/2018
Sigma Investor #27	\$	29,992.42	10/1/2018				
						Sum of Investments	
						AUD 12,390,018.52	Virgil CBA x2114
						\$ 4,629,977.24	Virgil CBA x0146

15. Between January and October 2018, Sigma Fund investors wired a total of \$14,320,180.44 USD to the Virgil CBA Accounts – \$12,390,018.52 AUD (valued at \$9,690,203.20 USD at the time of transfer)<sup>10</sup> to Virgil CBA x2114 and \$4,629,977.24 USD to Virgil CBA x0146. See relevant excerpts of Virgil CBA x2114 statements dated January 3, 2018 through March 2, 2019 and Virgil CBA x0146 statement dated October 1, 2018 – December 31, 2018, true and correct copies of which are attached hereto as **Exhibit 4**.

2. Step 2: Sigma Fund Investor Dollars Were Transferred From Virgil CBA Accounts to Qin Personal Accounts

16. The diagram below summarizes the transfer of Sigma Fund investor dollars from Virgil CBA Accounts to the Qin Personal Accounts. The tracing analysis follows in ¶17, *infra*.

<sup>10</sup> The equivalent value is calculated using the average price of USD-AUD on the date of the transaction, as reported by OFX.com.



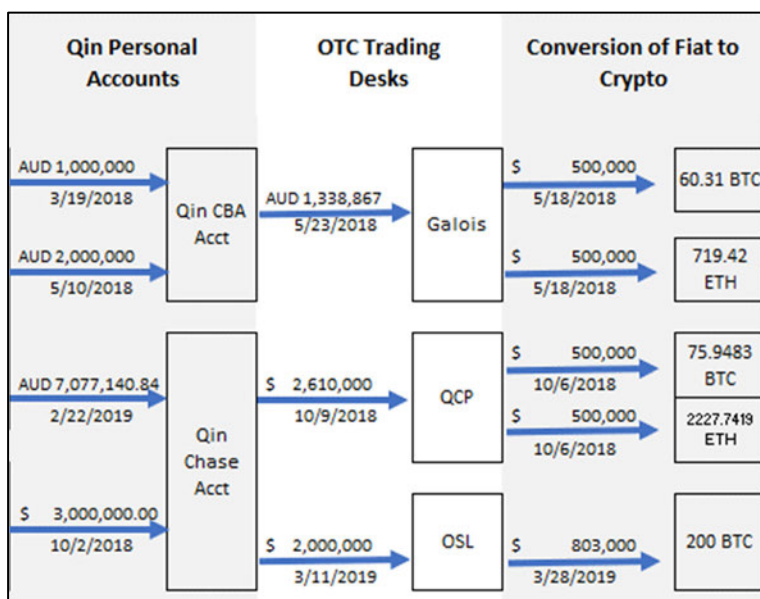
17. The Sigma Fund investor dollars were transferred from the Virgil CBA Accounts to the Qin Personal Accounts as follows: (a) on March 19, 2018 and May 10, 2018, Qin transferred a total of \$3 million AUD from Virgil CBA x2114 to the Qin CBA Account — \$1 million AUD (valued at approximately \$770,327 USD at the time of transfer) transferred on March 19, 2018 and \$2 million AUD (valued at approximately \$1,504,766 USD at the time of transfer) transferred on May 10, 2018. *See* pages 7 and 11 of **Exhibit 4**, reflecting the outbound transactions from Virgil CBA x2114; *see also* pages 13 and 20 of **Exhibit 5**, which contains relevant excerpts of a true and correct copy of the Qin CBA Account statements dated January 1 - June 30, 2018, reflecting the inbound transaction; (b) on October 2, 2018, Qin wired \$3 million USD from Virgil CBA x0146 to the Qin Chase Account. *See* page 18 of **Exhibit 4**, reflecting the outbound transaction; *see also* page 2 of **Exhibit 6**, which contains relevant excerpts of true and correct copies of the Qin Chase Account statements dated September 29, 2018 through March 29, 2019, reflecting the inbound transaction; (c) on February 22, 2019, Qin transferred \$7,077,140.84 AUD (valued at \$4,999,994 USD at the time of transfer) from Virgil CBA x2114



to the Qin Chase Account. See page 23 of **Exhibit 4**, reflecting the outbound transaction; see also page 7 of **Exhibit 6**, reflecting the inbound transaction.

3. Step 3: Sigma Fund Investor Dollars Were Transferred from Qin Personal Accounts to OTC Trading Desks

18. The diagram below summarizes the transfer of Sigma Fund investor dollars from the Qin Personal Accounts to OTC Trading Desks and the subsequent conversion of fiat to cryptocurrency. The tracing analysis follows in ¶¶ 19-23, *infra*.



19. From the Qin Personal Accounts, the Sigma Fund investor dollars were transferred to the OTC Trading Desks as follows: (a) on May 23, 2018, Qin wired \$1,338,867.32 AUD (valued at approximately \$999,985 USD at the time of transfer) from the Qin CBA Account to an account at Silvergate Bank held in the name Galois (the “Galois Transfer”). See page 22 of **Exhibit 5**, reflecting the outbound fiat wire; see also fiat settlement records from Galois, reflecting receipt of the inbound fiat wire, a true and correct copy of which is attached hereto as **Exhibit 7**; (b) on October 9, 2018, Qin wired \$2,610,000 USD from the Qin Chase Account to a Silvergate Bank account held in the name of QCP Capital (the “QCP Transfer”).

See page 3 of **Exhibit 6**, reflecting the outbound fiat wire; *see also* page 3 of the QCP Capital statement dated January 2018 – March 2021, reflecting receipt of the inbound fiat wire, a true and correct copy of which is attached hereto as **Exhibit 8**; (c) on March 11, 2019, Qin transferred \$2 million from the Qin Chase Account to a Silvergate Bank account in the name of OSL (the “OSL Transfer”). See page 8 of **Exhibit 6**, reflecting the outbound fiat wire; *see also* transaction data from the Qin OSL Account reflecting the above-referenced inbound deposit, a true and correct copy of which is attached hereto as **Exhibit 9**.

20. Each of the OTC Trading Desks subsequently converted the received fiat currency into cryptocurrency. See ¶¶ 21-23, *infra*.

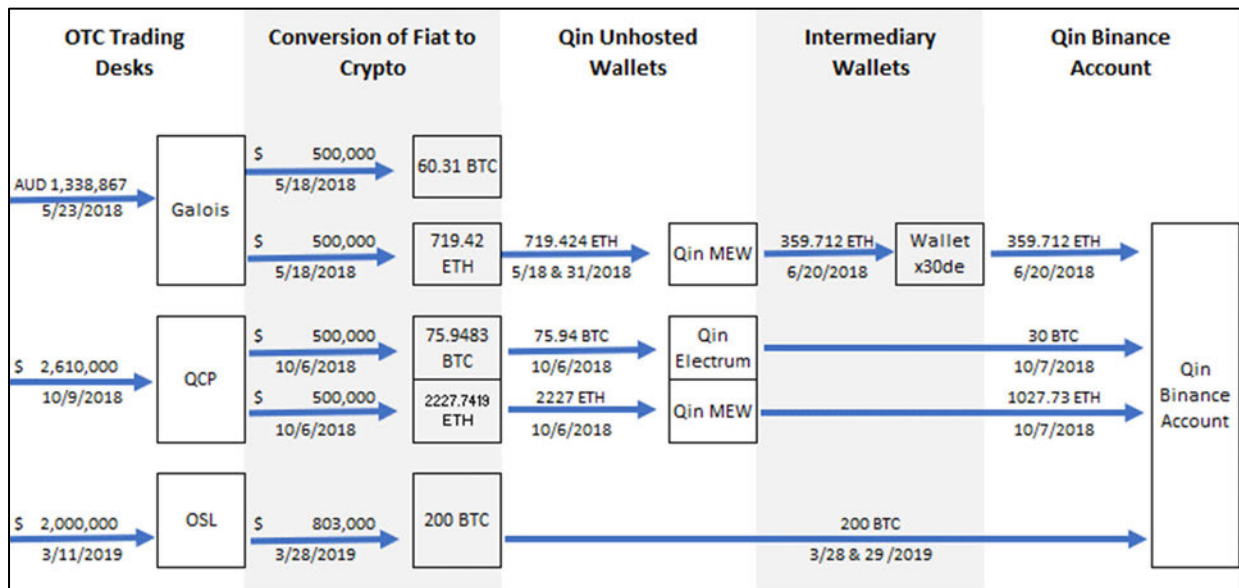
21. The Galois Transfer was used to cover payment for the following purchases of cryptocurrency Qin had executed on May 18, 2018: (i) 60.31 BTC (at a rate of \$8,290 USD per BTC) and (ii) 719.42 Ether (“ETH”) (at a rate of \$695 USD per ETH). See WhatsApp chat messages dated May 15, 2018, 4:21PM through May 22, 2018, 5:01PM between Qin and Galois, reflecting the above-referenced purchase instructions, a true and correct copy of which is attached hereto as **Exhibit 10**; and Qin-Galois trading records reflecting execution of the above-referenced purchases, a true and correct copy of which is attached hereto as **Exhibit 11**.

22. The QCP Transfer was used to cover payment for the following purchases of cryptocurrency Qin had executed on October 6, 2018: (i) 75.9483 BTC (at a rate of \$6,550 USD per BTC) and (ii) 2227.7419 ETH (at a rate of \$223.32 USD per ETH). See page 3 of **Exhibit 8** reflecting the above-referenced purchases of cryptocurrency. See also pages 3-12 of **Exhibit 12**, which contains relevant excerpts of a true and correct copy of WhatsApp chat messages between Qin and QCP Capital dated December 20, 2017 through January 30, 2019, reflecting the above-referenced purchase instructions.

23. On March 28, 2019, using \$803,000 USD from the OSL Transfer, Adaya purchased 200 BTC (at a rate of \$4,015 per BTC). See **Exhibit 9** reflecting execution of the above-referenced transaction; see also pages 5-9 of **Exhibit 13**, which contains a true and correct copy of relevant excerpts of WhatsApp chat messages with Adaya, Qin, and OSL, dated March 6—28, 2019, reflecting discussion and execution of the above-referenced purchase.

4. Step 4: Resultant Cryptocurrency Purchased With Sigma Fund Investor Dollars Was Transferred from OTC Trading Desks to Qin Binance Account

24. The below diagram summarizes the movement of funds from the OTC Trading Desks to the Qin Binance Account. The tracing analysis follows in ¶¶ 25-26, *infra*.



25. Between June 2018 and March 2019, a total of 235.996 BTC and 1,492.477 Ether (“ETH”) were deposited into the Qin Binance Account in 9 separate transactions. These deposits were the only deposits of cryptocurrency made in the Qin Binance Account—aside from a nominal number of REP tokens, which are not related to the transactions at issue here.<sup>11</sup> See

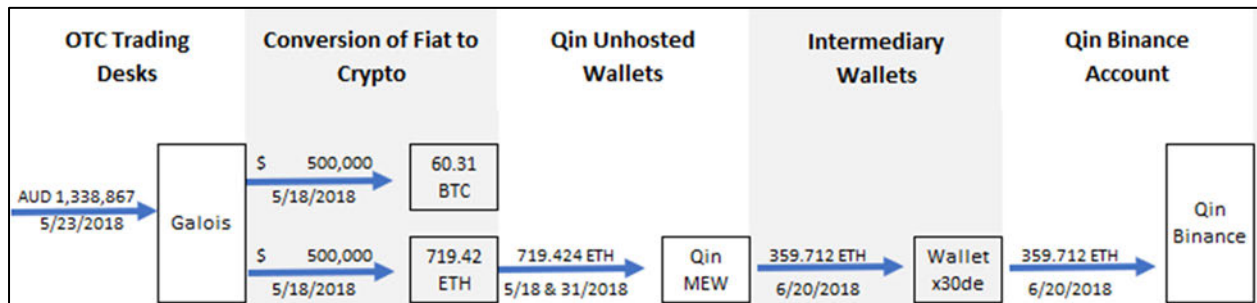
<sup>11</sup> During this time 15 REP tokens (with a value of \$191.70 USD at the time of transfer) were deposited into the Qin Binance Account. However, based on my tracing, the 15 REP are not related to the transactions at issue in the Motion or this Declaration.

deposit history for the Qin Binance Account, reflecting the above-referenced deposits, a true and correct copy of which is attached hereto as **Exhibit 2**.

26. Three deposits of BTC and ETH, initiated from the OTC Trading Desks and ultimately transferred to the Qin Binance Account, provided the cryptocurrency that funded the transfers of 1,588.88 USDT and 367.78 BCH to Adaya (Tranche 1 & 2, respectively): (a) Deposit 1: 359.712 ETH from Galois on June 20, 2018; (b) Deposit 2: 30 BTC and 1027.73 ETH from QCP Capital on October 7, 2018; and (c) Deposit 3: 200 BTC on March 28 & 29, 2019 from OSL. See ¶¶ 27-35, *infra*.

*a. Deposit 1: 359.712 ETH From Galois to Qin Binance Account*

27. The below diagram outlines the transfer of 359.712 ETH from Galois to the Qin Binance Account. The tracing analysis follows in ¶¶ 28-30, *infra*.



28. As explained in ¶21, *supra*, on May 18, 2018, Qin purchased 719.42 ETH from Galois. Galois subsequently transferred the purchased ETH to a Qin-controlled unhosted wallet address ending in “0c13” (“Qin MEW Wallet”) in two transactions as follows:

Date	Amount	Transaction Hash <sup>12</sup>
2018-05-18	359.712 ETH	[REDACTED] 3a99
2018-05-31	359.712 ETH	[REDACTED] a7fe

<sup>12</sup> A transaction hash (often abbreviated as tx hash) is a unique identifier, similar to a receipt, that serves as proof that a transaction was validated and added to the blockchain. In many cases, a transaction hash is needed to locate funds. See CoinbaseHelp, *What is a Transaction Hash/Hash ID?*, COINBASE, <https://help.coinbase.com/en/coinbase/getting-started/crypto-education/what-is-a-transaction-hash-hash-id> (last visited June 23, 2023).

See cryptocurrency transfer records between Galois and Qin reflecting the outbound transactions, a true and correct copy of which is attached hereto as **Exhibit 14**. See also ETH transactions broadcast to the Ethereum network on May 18, 2018, 21:38 (UTC) and May 31, 2018, 23:19 (UTC), as captured by the blockchain explorer, blockchair.com (“Blockchair”), true and correct copies of which are attached hereto as **Exhibit 15**.

29. On June 20, 2018 427.01 ETH (which included 359.712 ETH from Galois) was transferred in two transactions from the Qin MEW Wallet to an unhosted wallet address provided by Adaya ending in “03de” (“Wallet x30de”):

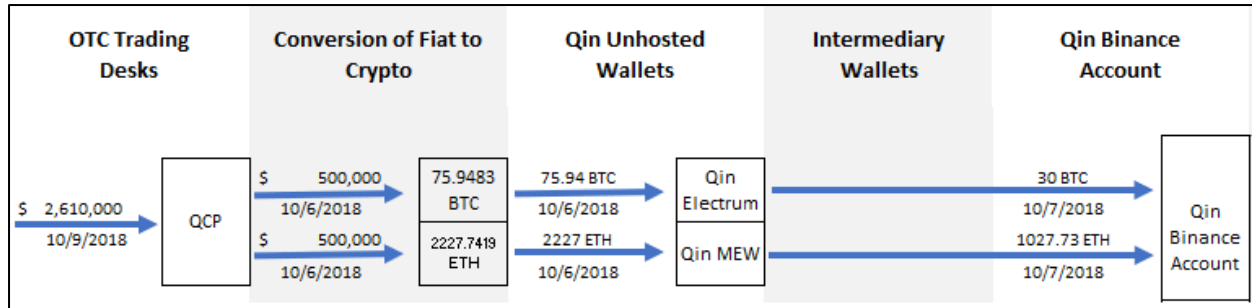
Date	Amount	Transaction Hash
2018-06-20	0.01ETH	[REDACTED] 5b89
2018-06-20	427 ETH	[REDACTED] 6522

See Slack direct message between Qin and Adaya dated June 19, 2018, reflecting the provision of the wallet address, a true and correct copy of which is attached hereto as **Exhibit 16**. See also ETH transactions broadcast to the Ethereum network on June 20, 2018, 00:13 (UTC) and 00:23 (UTC), as captured by Blockchair, true and correct copies of which are attached hereto as **Exhibit 17**.

30. Minutes later 464.729 ETH (which included 359.712 ETH from Galois) was transferred from Wallet x30de to a deposit address for the Qin Binance Account ending in “e184.” See **Exhibit 2**, reflecting the inbound transaction. See also ETH transaction broadcast to the Ethereum network on June 20, 2018, 00:56 (UTC), as captured by Blockchair, a true and correct copy of which is attached hereto as **Exhibit 18**.

*b. Deposit 2: 30 BTC and 1027.7 ETH from QCP Capital to the Qin Binance Account*

31. The below diagram outlines the transfer of cryptocurrency from QCP Capital to the Qin Binance Account. The tracing analysis follows in ¶¶ 32-33, *infra*.



32. As explained in ¶22, *supra*, on October 6, 2018, Qin purchased 75.9483 BTC and 2,227.7419 ETH from QCP Capital. That same day QCP Capital transferred the purchased BTC to a Qin-controlled unhosted wallet address ending in “fmKr” (“Qin Electrum Wallet”) and the purchased ETH to the Qin MEW Wallet in two transactions as follows:

Date	Amount	Transaction Hash
2018-10-06	75.9843 BTC	[REDACTED] 38a9
2018-10-06	2,227.7419 ETH	[REDACTED] 7371

See pages 9-11 of **Exhibit 12**, reflecting execution of the outbound transaction. See also BTC transaction broadcast to the Bitcoin network on Oct. 6, 2018, 21:13 (UTC) and ETH transaction broadcast to the Ethereum network on Oct. 6, 2018, 21:09 PM (UTC), as captured Blockchair, true and correct copies of which are attached hereto as **Exhibit 19**.

33. On October 7, 2018, 30 BTC (of the purchased 75.9483 BTC) were transferred from the Qin Electrum Wallet to a BTC deposit address for the Qin Binance Account ending in “byNa” in three transactions:

Date	Amount	Transaction Hash
2018-10-07	30 BTC	[REDACTED] d62c

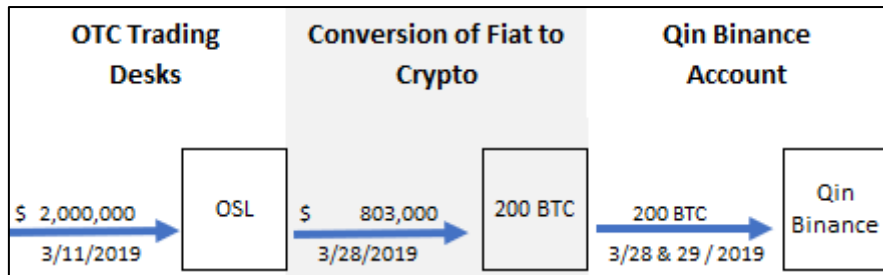
Simultaneously 1,027.73 ETH (of the purchased 2,227.7419 ETH) were transferred from the Qin MEW Wallet to an ETH deposit address for the Qin Binance Account ending in “e184” in two transactions:

Date	Amount	Transaction Hash
2018-10-07	927.73 ETH	[REDACTED] f37c
2018-10-07	100 ETH	[REDACTED] e335

See **Exhibit 2** reflecting the inbound transactions. See also BTC transactions broadcast to the Bitcoin network on Oct. 7, 2018 01:29 (UTC), Oct. 7, 2018 01:46 (UTC), and Oct. 7, 2018 01:54 (UTC); and ETH transactions broadcast to the Ethereum network on Oct. 7, 2018, 01:25 (UTC) and 01:42 (UTC), as captured by Blockchair, true and correct copies of which are attached hereto as **Exhibit 20**.

*c. Deposit 3: 200 BTC from OSL to the Qin Binance Account*

34. The below diagram outlines the transfer of cryptocurrency from OSL Capital to the Qin Binance Account. The tracing analysis follows in ¶¶ 35-37, *infra*.



35. As explained in ¶23, *supra*, on March 28, 2019, using \$803,000 USD from the OSL Transfer, Adaya purchased 200 BTC from OSL. That same day OSL transferred the purchased BTC to a BTC deposit address for the Qin Binance Account ending in “byNa” in two transactions:

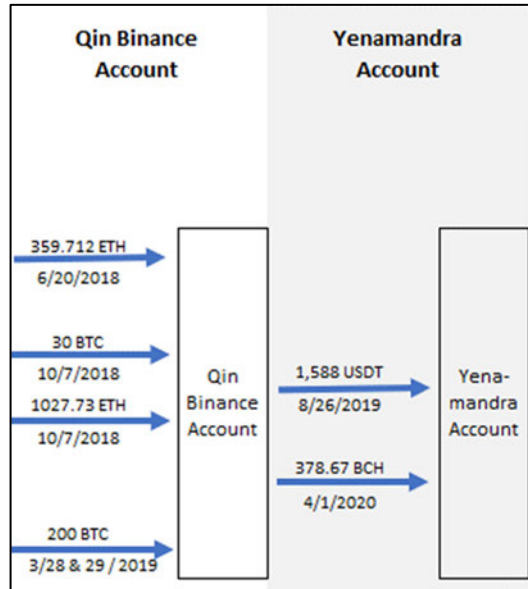
Date	Amount	Transaction Hash
2019-03-28	99.998 BTC	[REDACTED] 9a02
2019-03-29	99.998 BTC	[REDACTED] a512

See **Exhibit 9** reflecting the outbound transfers and **Exhibit 2** reflecting the inbound transfers. See also the BTC transactions broadcast to the Bitcoin network on March 28, 2019 19:57 (UTC) and March 29, 2019 01:39 (UTC), as captured by Blockchair, true and correct copies of which are attached hereto as **Exhibit 21**.



5. Step 5: Cryptocurrency Transferred from Qin Binance Account to Yenamandra Account

36. The below diagram outlines the transfer of cryptocurrency from the Qin Binance Account to the Yenamandra Account. The tracing analysis follows in ¶¶ 37-40, *infra*.



37. Between June 2018 and March 2019, 230 BTC and 1,387.442 ETH were deposited from the OTC Trading Desks into the Qin Binance Account. These assets were then traded at a high frequency for other digital assets, including USDT and BCH. This trading activity resulted in 1,588.88 USDT and 378.67 BCH that were subsequently transferred from the Qin Binance Account to the Yenamandra Account. See ¶¶ 38-40, *infra*.

38. On August 26, 2019, 1,588.88 USDT were transferred from the Qin Binance Account to a deposit address for the Yenamandra Account—a wallet address ending in “92d0.” See excerpt of the Qin Binance Account Withdrawal History, reflecting the outbound transaction, a true and correct copy of which is attached hereto as **Exhibit 22**. See also excerpts from Yenamandra Account Deposit History, reflecting the inbound transaction, a true and correct copy of which is attached hereto as **Exhibit 23**. The value of the USDT at the time of transfer was

approximately \$1,591 USD. *See* page 15 of **Exhibit 3**, reflecting the historical pricing data for USDT on August 26, 2019, as captured by Yahoo! Finance.

39. On April 1, 2020, 378.67 BCH were transferred from the Qin Binance Account to a deposit address for the Yenamandra Account – a wallet address ending in “dUxq.” *See Exhibits 22 and 23*, reflecting the outbound and inbound transactions, respectively. The value of the BCH at the time of transfer was approximately \$84,830 USD. *See* page 3 of **Exhibit 3**, reflecting the historical pricing data for BCH for April 1, 2020, as captured by Yahoo! Finance.

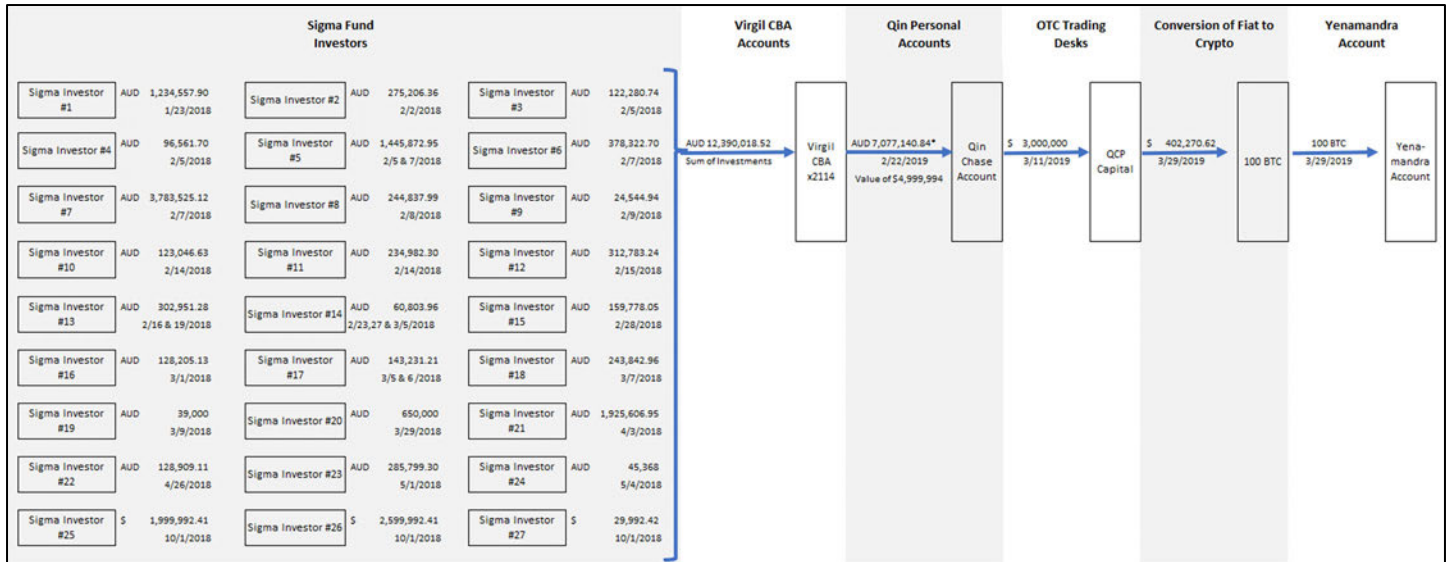
40. The 1,588.88 USDT and 378.67 BCH were commingled with, and traded extensively at a high frequency for, other digital assets within the Yenamandra Account. *See* Yenamandra Account Order History, a true and correct copy of which is attached hereto as **Exhibit 24**, reflecting trading activity volume of approximately 4,000 trades within the Yenamandra Account.

6. *Step 6: Cryptocurrency Transferred from Yenamandra Account to Nguyen Account*

41. In January 2021, the balance of the Yenamandra Account was withdrawn and subsequently transferred to the Nguyen Account. *See* ¶¶ 116-118, *infra*.

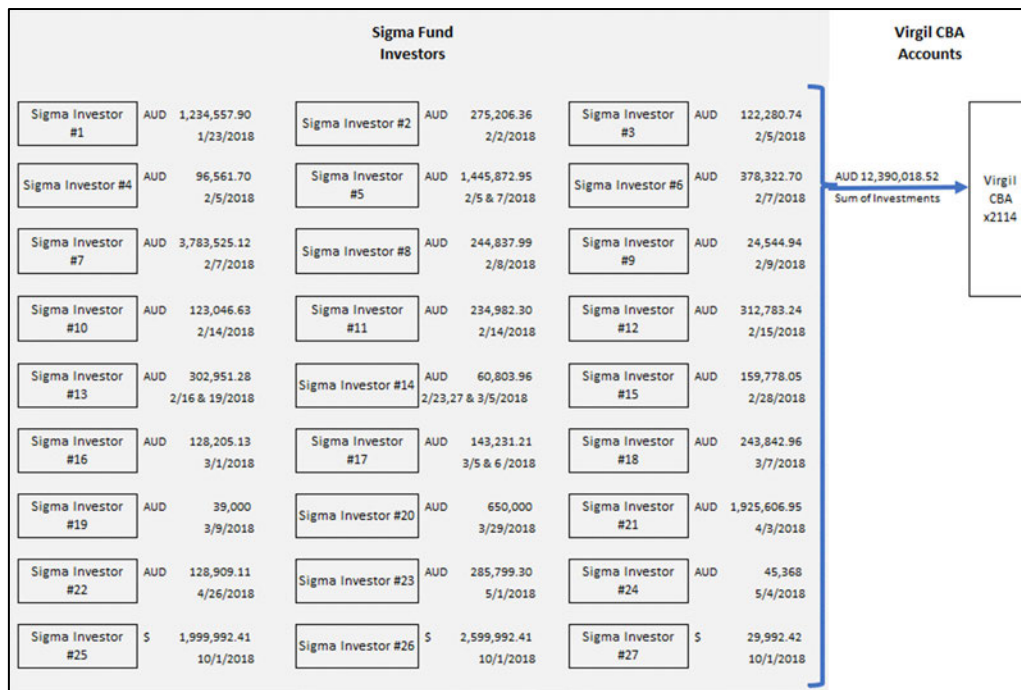
**B. Tranche 3: 100 BTC**

42. The diagram below illustrates the tracing of Tranche 3 from the Sigma Fund investors to the Yenamandra Account. The tracing analysis follows in ¶¶ 43-51, *infra*.



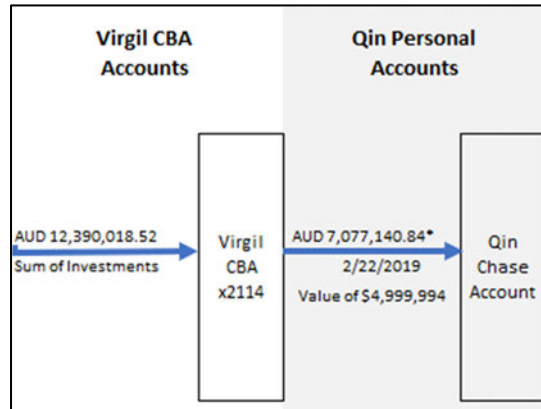
1. Step 1: Sigma Fund Investor Dollars Were Deposited Into the Virgil CBA Accounts

43. As explained in ¶14, *supra*, between January and October 2018, Sigma Fund investors wired a total of \$12,390,018.52 AUD to Virgil CBA x2114. The diagram below summarizes the Sigma Fund investor deposits.



2. Step 2: Sigma Fund Investor Dollars Were Transferred From Virgil CBA Accounts to Qin Personal Accounts

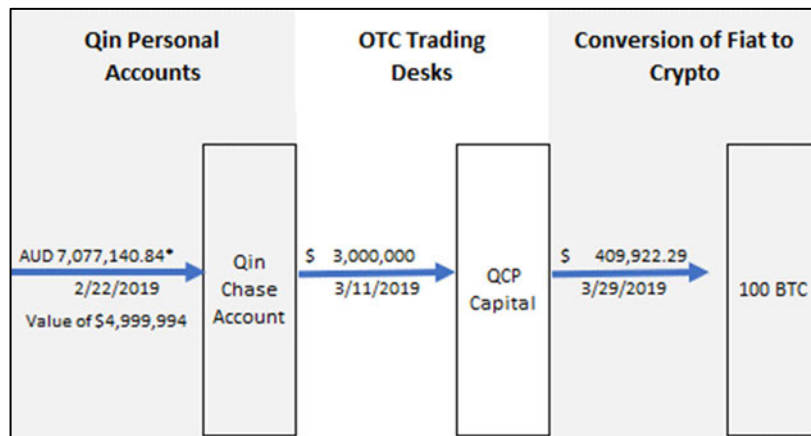
44. On February 22, 2019 Qin transferred \$7,077,140.84 AUD (\$4,999,994 USD) of Sigma Fund investor dollars from Virgil CBA x2114 to the Qin Chase Account. The diagram below summarizes the above-referenced transactions.



See page 23 of **Exhibit 4**, reflecting the outbound transaction; and page 7 of **Exhibit 6**, reflecting the inbound transaction.

3. Step 3: Sigma Fund Investor Dollars Were Transferred from Qin Personal Accounts to OTC Trading Desks

45. The diagram below outlines the transfer of Sigma Fund investor dollars from the Qin Chase Account to QCP Capital, including its conversion to cryptocurrency. The tracing analysis follows in ¶¶ 46-47, *infra*.

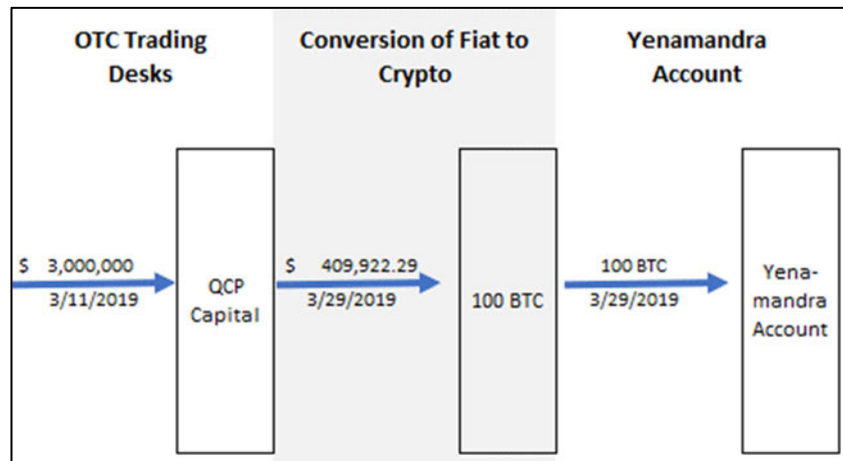


46. On March 11, 2019, Qin transferred \$3 million from the Qin Chase Account to QCP Capital. *See* page 8 of **Exhibit 6**, reflecting the outbound transaction and page 3 of **Exhibit 8**, reflecting the inbound transaction.

47. On March 29, 2019, using \$409,922.29 of the \$3 million transferred to QCP Capital, Adaya purchased 100 BTC. *See* relevant excerpts from WhatsApp chat messages dated March 5, 2019 and March 29, 2019 between Adaya and QCP Capital, reflecting the above-referenced purchase, a true and correct copy of which is attached hereto as **Exhibit 25**.

4. *Steps 4 & 5: Resultant Cryptocurrency Purchased With Sigma Fund Investor Dollars Was Transferred from OTC Trading Desks to the Yenamandra Account*

48. The below diagram outlines the transfer of cryptocurrency from QCP Capital to the Yenamandra Account. The tracing analysis follows in ¶¶ 49-50, *infra*.



49. On March 29, 2019, Adaya instructed QCP Capital to transfer the purchased 100 BTC to a BTC deposit address for the Yenamandra Account ending in “dUxq.” QCP Capital then executed the transfer in two transactions:

Date	Amount	Transaction Hash
2019-03-29	0.01000 BTC	[REDACTED] fcd7
2019-03-30	99.990000 BTC	[REDACTED] c1d5

See pages 4-5 of **Exhibit 25**, reflecting Adaya's instructions to QCP Capital and QCP Capital's confirmation of the outbound transfers. See also page 3 of **Exhibit 23**, reflecting the inbound transaction. The value of the BTC at the time of transfer was \$410,665.92. See page 5 of **Exhibit 3**, reflecting the historical pricing data for BTC on March 29 and 30, 2019 as captured by Yahoo! Finance.

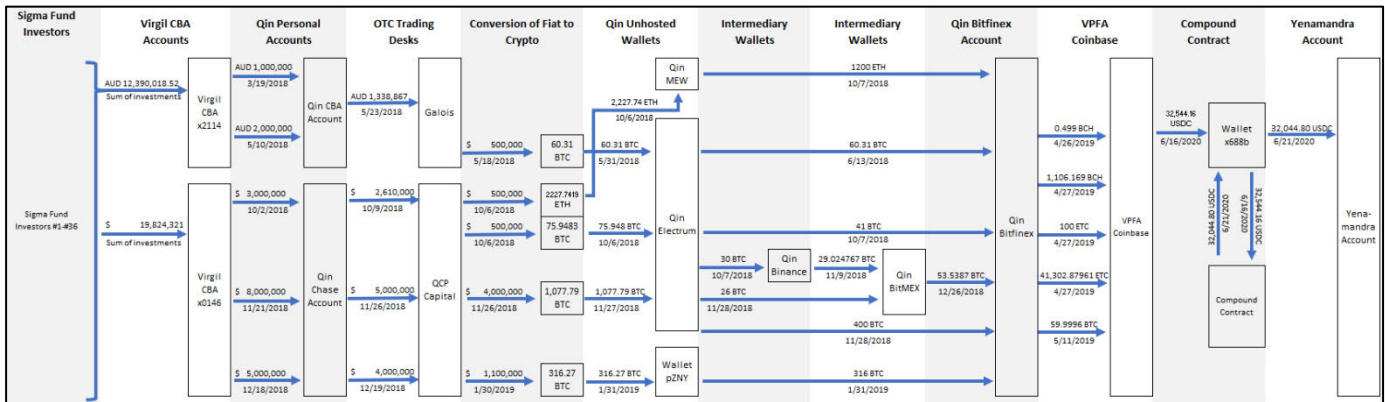
50. The 100 BTC were commingled with, and traded extensively at a high frequency for, other digital assets within the Yenamandra Account. See **Exhibit 24**, reflecting trading activity volume of approximately 4,000 trades within the Yenamandra Account.

5. Step 6: Cryptocurrency Transferred from Yenamandra Account to Nguyen Account

51. In January 2021, the balance of the Yenamandra Account was withdrawn and subsequently transferred to the Nguyen Account. See ¶¶ 116-118, *infra*.

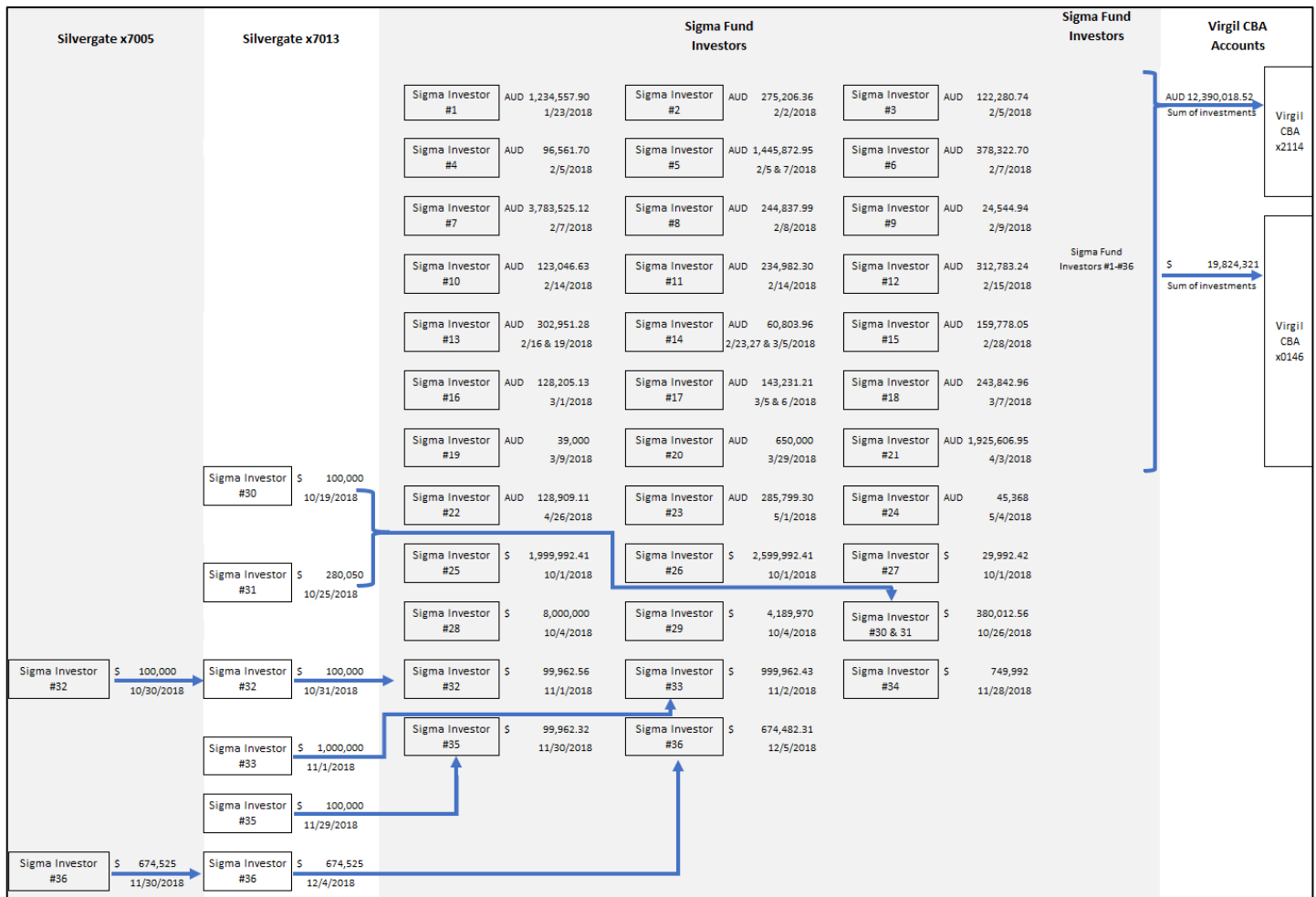
C. Tranche 4: 32,044.80 USDC

52. The diagram below illustrates the tracing of Tranche 4 from the Sigma Fund investors to the Yenamandra Account. The tracing analysis follows in ¶¶ 53-99, *infra*.



1. Step 1: Sigma Fund Investor Dollars Were Deposited Into the Virgil CBA Accounts

53. The diagram below summarizes the deposits of Sigma Fund investor dollars into the Virgil CBA Accounts. The tracing follows in ¶¶ 54-59, *infra*.



54. Between January and December 2018, Sigma Fund investors directly and indirectly wired a total of \$29,514,524 USD to the Virgil CBA Accounts — \$12,390,018.52 AUD (valued at \$9,690,203.20 USD at the time of transfer) to Virgil CBA x2114 and \$19,824,321 USD to Virgil CBA x0146. *See Exhibit 4*, reflecting the inbound transfers to the Virgil CBA Accounts.

55. Of the \$19,824,321 USD wired to Virgil CBA x0146, \$12,939,962 USD was wired directly from Sigma Fund investors, while \$2,254,382 USD was wired indirectly, as explained in ¶¶ 56-59, *infra*.

56. Between October 19, 2018 and November 29, 2018, Sigma Fund investors wired \$1,480,050 USD to a bank account at Silvergate Bank ending in x7013 registered in the name of



Virgil Sigma Fund, LP (“Silvergate x7013”). See Silvergate x7013 statement summaries dated October 31, 2018 and November 30, 2018, true and correct copies of which are attached hereto as **Exhibit 26**.

57. On October 30, 2018 and November 30, 2018, Sigma Fund investors wired \$774,525 USD to a bank account at Silvergate Bank ending in x7005 registered in the name of Virgil Capital, LLC, the general partner of Sigma Fund (“Silvergate x7005”). See Silvergate x7005 statement summaries dated October 31, 2018 through December 31, 2018, true and correct copies of which are attached hereto as **Exhibit 27**.

58. The \$774,525 USD originally deposited in Silvergate x7005 was transferred to Silvergate x7013 as follows: (a) \$100,000 USD on October 31, 2018; and (b) \$674,525 USD on December 4, 2018. See pages 2 and 6 of **Exhibit 27** and pages 2 and 4 of **Exhibit 26**, reflecting the outbound and inbound transfers, respectively.

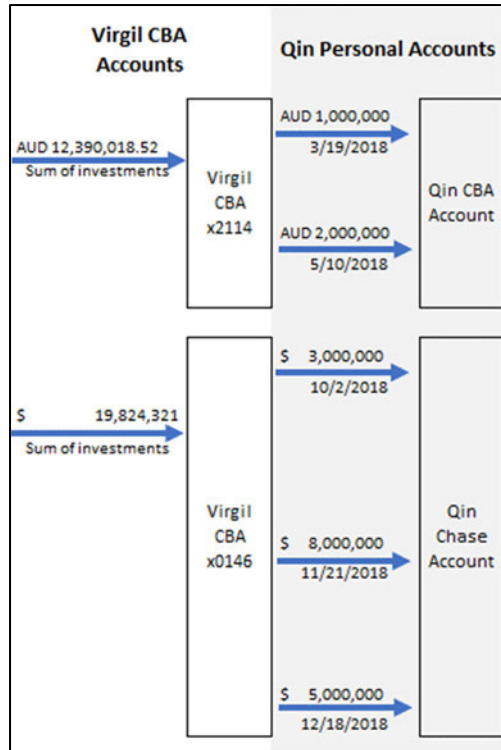
59. The \$2,254,575 USD in Silvergate x7013 was then transferred to Virgil CBA x0146 as follows: (i) \$380,012.56 USD on October 26, 2018; (ii) \$99,962.56 USD on November 1, 2018; (iii) \$999,962.43 USD on November 2, 2018; (iv) \$99,962.32 on November 30, 2018; and (v) \$674,482.31 on December 5, 2018.<sup>13</sup> See pages 2, 4, and 5 of **Exhibit 26** and pages 25-26 of **Exhibit 4**, reflecting the outbound and inbound transfers.

2. Step 2: Sigma Fund Investor Dollars Were Transferred From Virgil CBA Accounts to Qin Personal Accounts

60. The diagram below outlines the flow of funds from Virgil CBA Accounts to the Qin Personal Accounts. The tracing analysis follows in ¶61, *infra*.

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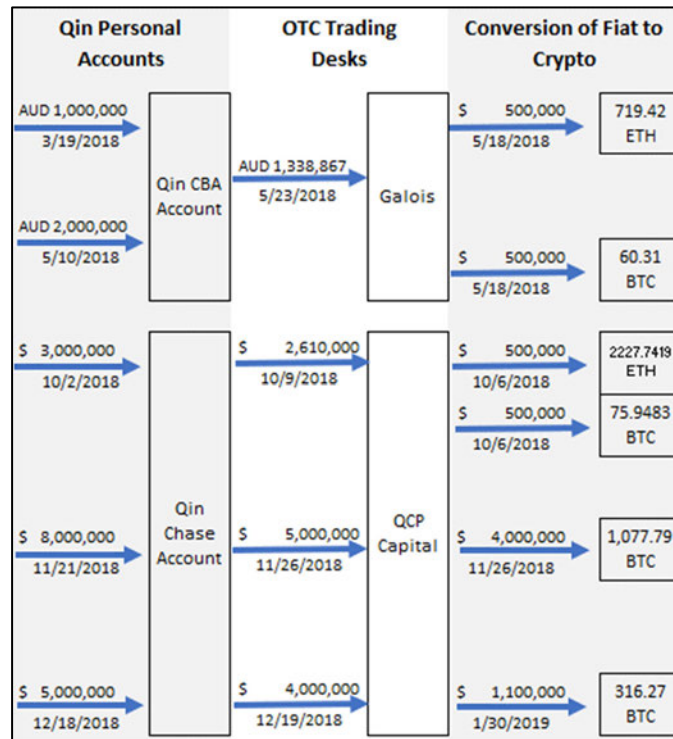
<sup>13</sup> The difference between the amount deposited in Virgil CBA x0146 and the amount received by Silvergate x7013 can be attributed to wire fees associated with these transfers.



61. The Sigma Fund investor dollars were transferred from the Virgil CBA Accounts to the Qin Personal Accounts as follows: (a) on March 19, 2018 and May 10, 2018, Qin transferred a total of \$3 million AUD from Virgil CBA x2114 to the Qin CBA Account — \$1 million AUD (valued at approximately \$770,327 USD at the time of transfer) transferred on March 19, 2018 and \$2 million AUD (valued at approximately \$1,504,766 USD at the time of transfer) transferred on May 10, 2018; (b) on October 2, 2018, November 21, 2018, and December 18, 2018 Qin transferred a total of \$16 million USD from Virgil CBA x0146 to the Qin Chase Account — \$3 million on October 2, 2018; \$8 million on November 21, 2018; and \$5 million on December 18, 2018. *See* ¶17, *supra*. *See also* pages 7 and 11 of **Exhibit 4**, reflecting the outbound transactions from Virgil CBA x2114; pages 13 and 20 of **Exhibit 5**, reflecting the inbound transactions to Qin CBA Account; pages 24 and 26 of **Exhibit 4**, reflecting the outbound transactions from Virgil CBA x0146; and pages 2, 4 and 6 of **Exhibit 6**, reflecting the inbound transactions to the Qin Chase Account.

3. Step 3: Sigma Fund Investor Dollars Were Transferred from Qin Personal Accounts to OTC Trading Desks

62. The diagram below summarizes the transfer of Sigma Fund investor dollars from the Qin Personal Accounts to OTC Trading Desks and the subsequent conversion of fiat to cryptocurrency. The tracing analysis follows in ¶¶ 63-68, *infra*.



63. From the Qin Personal Accounts, the Sigma Fund investor dollars were transferred to the OTC Trading Desks as follows: (a) on May 23, 2018, Qin wired \$1,338,867 AUD (valued at approximately \$999,985 USD at the time of transfer) from the Qin CBA Account to Galois (“Galois Transfer”). *See* ¶19, *supra*; (b) on October 9, 2018, Qin wired \$2,610,000 USD from the Qin Chase Account to QCP Capital (“QCP Transfer”). *See* ¶19, *supra*; (c) on November 26, 2018, Qin wired \$5 million USD from the Qin Chase Account to QCP Capital (“QCP Transfer 2”). *See* page 5 of **Exhibit 6**; and (d) on December 19, 2018, Qin

wired \$4 million USD from the Qin Chase Account to QCP Capital (“QCP Transfer 3”). *See Id.* at page 6.

64. Each of the OTC Trading Desks subsequently converted the fiat currency received into cryptocurrency. *See* ¶¶ 65-68, *infra*.

65. As previously discussed in ¶21, *supra*, the Galois Transfer was used to cover payment for the purchase of (i) 60.31 BTC and (ii) 719.42 ETH, which Qin executed on May 18, 2018.

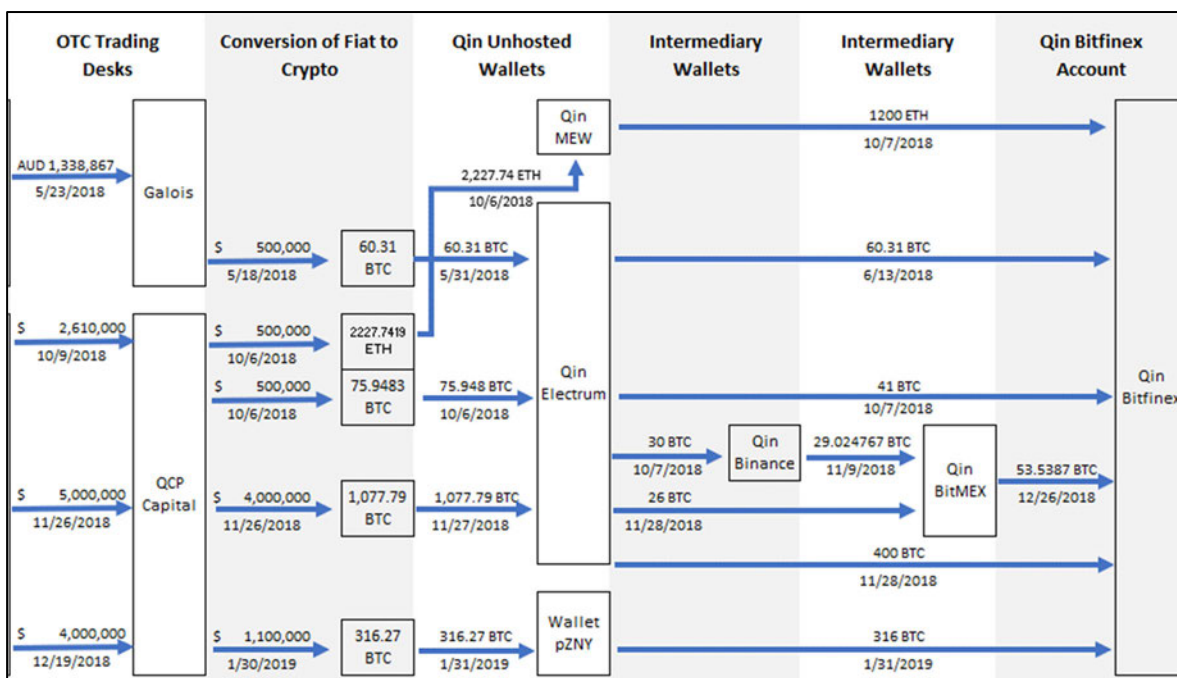
66. As discussed in ¶22, *supra*, the QCP Transfer was used to cover payment for the purchase of (i) 75.9483 BTC and (ii) 2227.7419 ETH, which Qin executed on October 6, 2018.

67. On November 26, 2018, Qin used \$4 million USD from QCP Transfer 2 to cover payment for the purchase of 1,077.79 BTC. *See* page 3 of **Exhibit 8** and pages 12-18 of **Exhibit 12**, reflecting the discussion and execution of the above-referenced cryptocurrency purchase.

68. On January 30, 2019, Qin used \$1.1 million USD from QCP Transfer 3 to purchase 316.27 BTC. *See* pages 20-22 of **Exhibit 12**, reflecting the discussion and execution of the above-referenced cryptocurrency purchase.

4. *Step 4: Resultant Cryptocurrency Purchased With Sigma Fund Investor Dollars Was Transferred from OTC Trading Desks to Qin Bitfinex Account*

69. The below diagram summarizes the movement of funds from the OTC Trading Desks to the Qin Bitfinex Account. The tracing analysis follows in ¶¶ 70-90, *infra*.

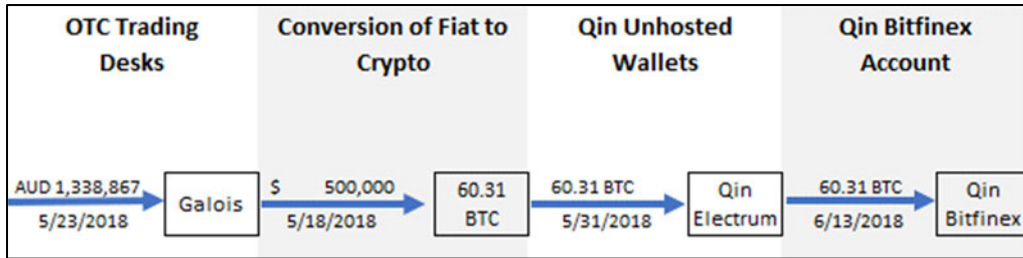


70. Between April 2018 and January 2019, a total of 881.04 BTC and 1,200 ETH were deposited into the Qin Bitfinex Account in 12 separate transactions. These deposits were the only deposits of cryptocurrency made in the Qin Bitfinex Account. *See* Qin Bitfinex Account deposit records, a true and correct copy of which is attached hereto as **Exhibit 28**.

71. Five deposits of BTC and ETH, initiated from the OTC Trading Desks and ultimately transferred to the Qin Bitfinex Account, provided the cryptocurrency that funded the transfer of 32,044.80 USDC to Adaya: (a) Deposit 1: 60.31 BTC from Galois on June 13, 2018; (b) Deposit 2: 41 BTC and 1200 ETH from QCP Capital on October 7, 2018; (c) Deposit 3: 400 BTC on November 28, 2018 from QCP Capital; (d) Deposit 4: 53.5387 BTC on December 26, 2018 from QCP Capital; and (e) Deposit 5: 316 BTC on January 31, 2019 from QCP Capital. *See* ¶¶ 72- 90, *infra*.

*a. Deposit 1: 60.31 BTC from Galois to Qin Bitfinex Account*

72. The below diagram outlines the transfer of 60.31 BTC from Galois to the Qin Bitfinex Account. The tracing analysis follows in ¶¶ 73-74, *infra*.



73. As detailed in ¶21, *supra*, on May 18, 2018, Qin purchased 60.31 BTC from Galois. On May 31, 2018, Galois transferred 60.31 BTC to the Qin Electrum Wallet as follows:

Date	Amount	Transaction Hash
2018-05-18	60.31 BTC	[REDACTED] 27c2

See **Exhibit 14**, reflecting the outbound transfer from Galois. See also BTC transaction broadcast to the Bitcoin network on May 31, 2018 23:20 (UTC), as captured by Blockchair, a true and correct copy of which is attached hereto as **Exhibit 30**.

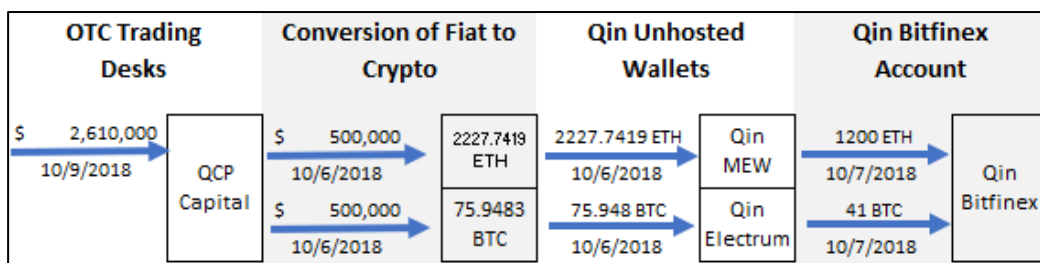
74. On June 13, 2018 70.5 BTC (which included 60.31 BTC from Galois) was transferred from the Qin Electrum Wallet and received by a BTC deposit address for the Qin Bitfinex Account ending in “6F3P” as follows:

Date	Amount	Transaction Hash
2018-06-13	0.501 BTC	[REDACTED] a524
2018-06-13	69.9989 BTC	[REDACTED] d9fe

See **Exhibit 28**, reflecting the inbound transactions. See also BTC transactions broadcast to the Bitcoin network on June 13, 2018, 00:16 (UTC) and 01:34 (UTC), as captured by Blockchair, true and correct copies of which are attached hereto as **Exhibit 29**.

b. Deposit 2: 41 BTC and 1200 ETH from QCP Capital to Qin Bitfinex Account

75. The below diagram outlines the transfer of 41 BTC and 1200 ETH from QCP Capital to the Qin Bitfinex Account. The tracing analysis follows in ¶¶ 76-78, *infra*.



76. As detailed in ¶¶22 and 32, *supra*, on October 6, 2018, Qin purchased (i) 75.9483 BTC and (ii) 2227.7419 ETH from QCP Capital. That same day QCP Capital transferred the purchased BTC to the Qin Electrum Wallet and the purchased ETH to the Qin MEW Wallet as follows:

Date	Amount	Transaction Hash
2018-10-06	75.9843 BTC	[REDACTED] 38a9
2018-10-06	2,227.7419 ETH	[REDACTED] 7371

77. On October 7, 2018, 1,200 ETH were transferred from the Qin MEW Wallet to an ETH deposit address for the Qin Bitfinex Account ending in “f358” in two transactions:

Date	Amount	Transaction Hash
2018-10-07	100 ETH	[REDACTED] cc21
2018-10-07	1100 ETH	[REDACTED] 1e17

See **Exhibit 28**, reflecting the inbound transactions. See also ETH transactions broadcast to the Ethereum network on Oct. 7, 2018, 01:00 (UTC) and 01:10 (UTC), as captured by Blockchair, true and correct copies of which are attached hereto as **Exhibit 31**.

78. On October 7, 2018, 41 BTC were transferred from the Qin Electrum Wallet to a BTC deposit address for the Qin Bitfinex Account ending in “6F3P” in two transactions:

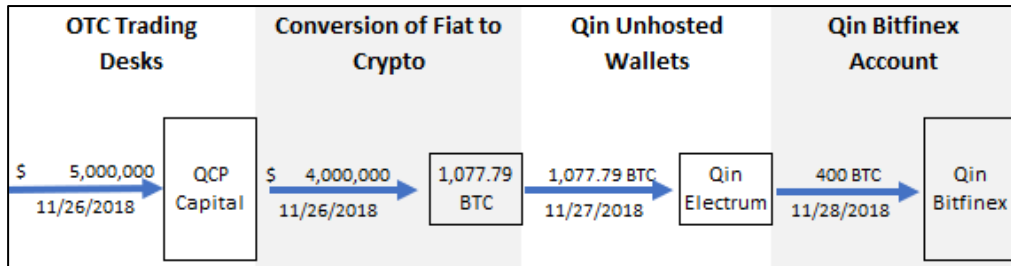
Date	Amount	Transaction Hash
2018-10-07	1 BTC	[REDACTED] 49fc
2018-10-07	40 BTC	[REDACTED] 4c11

See **Exhibit 28** reflecting the inbound transactions. See also BTC transactions broadcast to the Bitcoin network on Oct. 7, 2018, 01:13 (UTC) and 01:46 (UTC), as captured by Blockchair, true and correct copies of which are attached hereto as **Exhibit 32**.



c. Deposit 3: 400 BTC from QCP Capital to Qin Bitfinex Account

79. The below diagram outlines the transfer of 400 BTC from QCP Capital to the Qin Bitfinex Account. The tracing analysis follows in ¶¶ 80-81, *infra*.



80. As detailed in ¶67, *supra*, on November 26, 2018, Qin purchased 1,077.79 BTC from QCP Capital. On November 27, 2018, QCP Capital transferred 1,077.79 BTC to the Qin Electrum Wallet in two transactions:

Date	Amount	Transaction Hash
2018-11-27	500 BTC	[REDACTED] 3436
2018-11-27	579.7048 BTC	[REDACTED] eb51

See pages 12-18 of **Exhibit 12**, reflecting discussion and execution of the above-referenced transactions. See also BTC transactions broadcast to the Bitcoin network on Nov. 27, 2018, 12:29 (UTC) and 21:31 (UTC), as captured by Blockchair, true and correct copies of which are attached hereto as **Exhibit 33**.

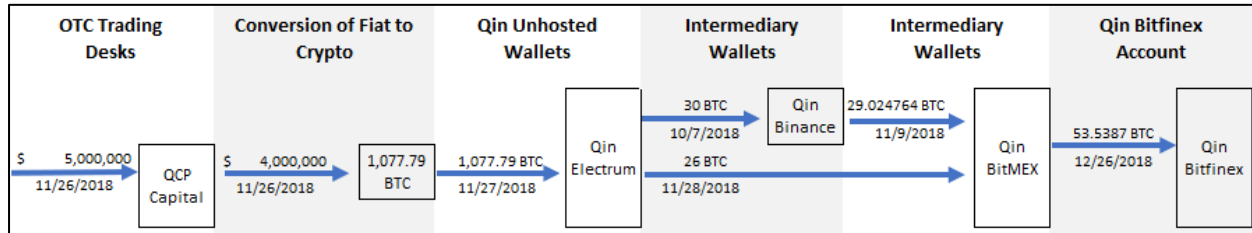
81. On November 28, 2018, 400 BTC were transferred from the Qin Electrum Wallet to a BTC deposit address for the Qin Bitfinex Account ending in “6F3P” as follows:

Date	Amount	Transaction Hash
2018-11-28	400 BTC	[REDACTED] 939f

See **Exhibit 28**, reflecting the above-referenced inbound transactions. See also the BTC transaction broadcast to the Bitcoin network on Nov. 28, 2018, 00:01 (UTC), as captured by Blockchair, a true and correct copy of which is attached hereto as **Exhibit 34**.

*d. Deposit 4: 53.5387 BTC from QCP Capital to Qin Bitfinex Account*

82. The below diagram outlines the transfer of 53.5387 BTC from QCP Capital to the Qin Bitfinex Account. The tracing analysis follows in ¶¶ 83-86, *infra*.



83. As explained in ¶¶ 63 and 67, *supra*, on November 26, 2018 Qin wired \$5 million USD from Qin Chase Account to QCP Capital and used \$4 million to purchase 1,077.79 BTC. As explained in ¶80, *supra*, on November 27, 2018 QCP Capital transferred 1,077.79 BTC to the Qin Electrum Wallet.

84. On November 28, 2018, 26 BTC were transferred from the Qin Electrum Wallet to a deposit address ending in “Y2uC” for the Qin BitMEX Account, which was used to transact business for VPFA Ltd.<sup>14</sup> See **Exhibit 35**, which contains a true and correct copy of transaction records for the Qin BitMEX Account, reflecting the above-referenced inbound transfer. See also BTC transaction broadcast to the Bitcoin network on Nov. 28, 2018, 01:24 (UTC), as captured by Blockchair, a true and correct copy of which is attached hereto as **Exhibit 36**.

85. As explained in ¶33, *supra*, on October 7, 2018, 30 BTC were transferred from the Qin Electrum Wallet to the Qin Binance Account. On November 9, 2018, 29.024767 BTC were transferred from the Qin Binance Account to the Qin BitMEX Account as follows:

Date	Amount	Transaction Hash
2018-11-09	29.024764 BTC	[REDACTED] 1af7

<sup>14</sup> The Qin BitMEX Account refers to an account with a User ID ending in 0740.

See **Exhibit 35**, reflecting the inbound transfer; and excerpts from the Qin Binance Account withdrawal records reflecting the outbound transfer, a true and correct copy of which is attached hereto as **Exhibit 37**. See also BTC transactions broadcast to the Bitcoin network on Nov 9, 2018, 00:58 (UTC) and 01:21 AM (UTC), as captured by Blockchair, true and correct copies of which are attached hereto as **Exhibit 38**.

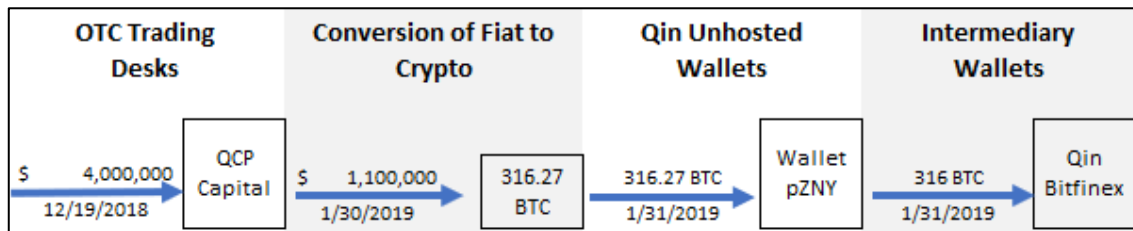
86. On December 26, 2018, 53.5387 BTC were transferred from the Qin BitMEX Account to a BTC deposit address for the Qin Bitfinex Account ending in “6F3P” as follows:

Date	Amount	Transaction Hash
2018-12-26	53.5387 BTC	[REDACTED]d7dc

See **Exhibits 35** and **28** reflecting the outbound and inbound transactions, respectively. See also the BTC transaction broadcast to the Bitcoin network on Dec 26, 2018, 13:55 (UTC), as captured by Blockchair, a true and correct copy of which is attached hereto as **Exhibit 39**.

*e. Deposit 4: 316 BTC from QCP Capital to Qin Bitfinex Account*

87. The below diagram outlines the transfer of 316 BTC from QCP Capital to the Qin Bitfinex Account. The tracing analysis follows in ¶¶ 88-90, *infra*.



88. As explained in ¶63, *supra*, on December 19, 2018, Qin wired \$4 million USD from the Qin Chase Account to QCP Capital. As explained in ¶68, *supra*, on January 30, 2019, Qin used \$1.1 million USD to purchase 316.27 BTC.

89. On January 31, 2019, QCP Capital transferred the 316.27 BTC to, an unhosted wallet address provided by Qin ending in “pZNY” (“Wallet pZNY”) in the following transaction:

Date	Amount	Transaction Hash
2019-01-31	316.27 BTC	[REDACTED] 2722

See page 22 of **Exhibit 12**, reflecting discussion and execution of the above-referenced transaction. See also BTC transaction broadcast to the Bitcoin network on Jan. 31, 2019, 04:36 (UTC), as captured by Blockchair, a true and correct copy of which is attached hereto as **Exhibit 40**.

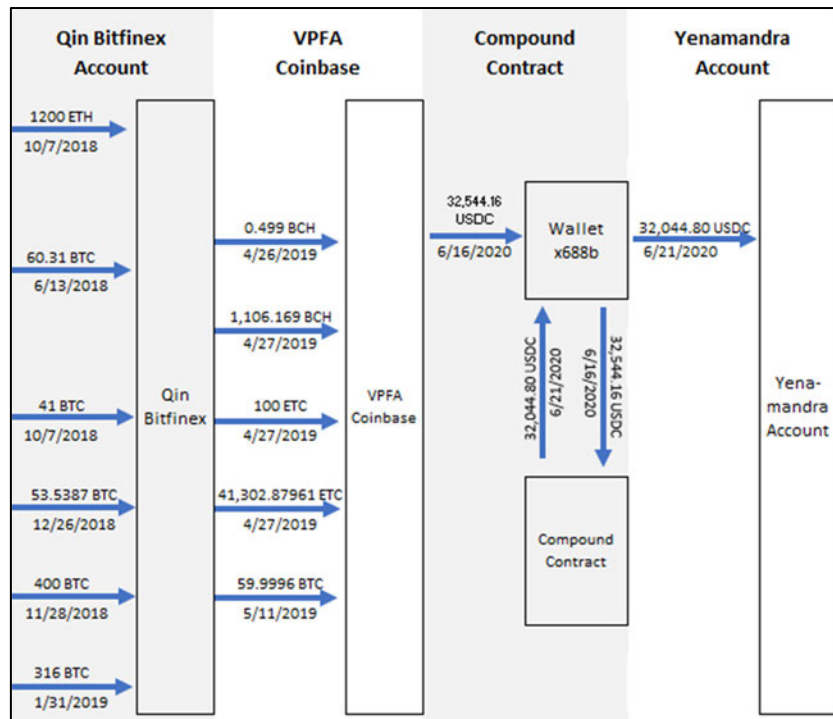
90. Minutes later, Qin transferred 316 BTC from Wallet pZNY to a BTC deposit address for the Qin Bitfinex Account ending in “6F3P” in the following transaction:

Date	Amount	Transaction Hash
2019-01-31	316 BTC	[REDACTED] ce07

See **Exhibit 28**, reflecting the above-referenced inbound transaction. See also BTC transaction broadcast to the Bitcoin network on Jan. 31, 2019, 04:54 (UTC), as captured by Blockchair, a true and correct copy of which is attached hereto as **Exhibit 41**.

5. Step 5: Cryptocurrency Transferred from Qin Bitfinex Account to Yenamandra Account

91. The below diagram outlines the transfer of cryptocurrency from the Qin Bitfinex Account to the Yenamandra Account. The tracing analysis follows in ¶¶ 92-98, *infra*.



a. Qin Bitfinex Account to VPFA Coinbase

92. Between October 2018 and January 2019, 881.04 BTC and 1,200 ETH was deposited from the OTC Trading Desks into the Qin Bitfinex Account. As explained in ¶70, *supra*, these were the only deposits of cryptocurrency made into the Qin Bitfinex Account, and each deposit can be traced back to Sigma Fund investor dollars. The BTC and ETH deposited were then traded in the Qin Bitfinex Account at a high frequency for other digital assets, including Ethereum Classic (“ETC”) and BCH.<sup>15</sup>

93. Between April 26, 2019 and May 11, 2019, there were five transfers of cryptocurrency from the Qin Bitfinex Account to the VPFA Coinbase Account: (a) 0.499 BCH on April 26, 2019; (b) 1,106.169 BCH on April 27, 2019; (c) 100 ETC on April 27, 2019; (d) 41,302.87961 ETC on April 27, 2019; and (e) 59.9996 BTC on May 11, 2019. *See* excerpts of withdrawal records for Qin Bitfinex Account reflecting the outbound transactions, a true and

<sup>15</sup> The Bitfinex records label BCH as BAB, but they are the same token.

correct copy of which is attached hereto as **Exhibit 42**. *See also* excerpts from VPFA Coinbase Account transaction records reflecting the inbound transactions, a true and correct copy of which is attached hereto as **Exhibit 43**. The approximate USD values at the time of the transfers were (a) \$292,093.92 (value of BCH), (b) \$227,715.84 (value of ETC), and (c) \$432,214.15 (value of BTC). *See* pages 1, 9, and 4 of **Exhibit 3**, reflecting the historical pricing data for BCH for April 25-28, 2019, ETC for April 26-28, 2019, and BTC for May 10-12, 2019, respectively, as captured by Yahoo! Finance.

94. The BCH, ETC, and BTC deposited into the VPFA Coinbase Account were then commingled with, and traded at a high frequency for, other digital assets within the VPFA Coinbase Account, including USDC. *See* trading activity for VPFA Coinbase Account, as reflected in the exchange transaction records, a true and correct copy of which is attached hereto as **Exhibit 44**. This trading activity resulted in the 32,544.16 USDC that was withdrawn from the VPFA Coinbase Account, portions of which were subsequently deposited into the Yenamandra Account, as explained in ¶¶ 95-98, *infra*.

*b. VPFA Coinbase to Yenamandra Account*

95. On June 16, 2020, 32,544.16 USDC were transferred from the VPFA Coinbase Account to an unhosted wallet ending in “688b” (“Wallet x688b”) believed to be owned and/or controlled by Adaya<sup>16</sup> in the following transaction:

Date	Amount	Transaction Hash
2020-06-16	32,544.16 USDC	[REDACTED] 2b7a

*See* excerpts of withdrawal records from the VPFA Coinbase Account, reflecting the above-referenced outbound transaction, a true and correct copy of which is attached hereto as **Exhibit**

<sup>16</sup> This belief is based on the type of activity conducted in the wallet – high frequency trading in decentralized finance – which matches certain strategies Adaya was working on at the time for VQR.

45. *See also* page 2 of **Exhibit 46**, reflecting a true a correct copy of the USDC transaction broadcast to the Ethereum network on June 16, 2020, 04:07 (UTC), as captured by Blockchair.

96. On June 16, 2020, 32,544.16 USDC from Wallet x688b were transferred to a Compound USDC smart contract (“Compound Contract”), where the USDC was held as collateral. In exchange for the 32,544.16 USDC, the Compound Contract minted and transferred to Wallet x688b 1,545,356.02 cUSDC, evidencing Wallet x688b’s claim to the 32,544.16 USDC held in the Compound Contract. The above-referenced transfers were identified by the transaction hash [REDACTED] a6a6. *See* page 3 of **Exhibit 46**, reflecting the USDC transaction broadcast to the Ethereum network on June 16, 2020, 04:39 (UTC) as captured by Blockchair.

97. On June 21, 2020, 1,521,582.78 cUSDC were transferred from Wallet x688b to the Compound Contract and redeemed for 32,044.80 USDC, a transaction identified by the transaction hash [REDACTED] 493a. *See* page 4 of **Exhibit 46**, reflecting the USDC transaction broadcast to the Ethereum network on June 21, 2020, 14:26 (UTC) as captured by Blockchair.

98. Minutes later, on June 21, 2020, the 32,044.80 USDC were transferred from Wallet x688b to a deposit address for the Yenamandra Account ending in “92d0,” in a transaction identified by the transaction hash [REDACTED] 6dab. *See* page 5 of **Exhibit 46**, reflecting the USDC transaction broadcast to the Ethereum network on June 21, 2020, 14:27 (UTC) as captured by Blockchair. The value of the USDC at the time of transfer was \$32,115.59. *See* page 14 of **Exhibit 3**, reflecting the historical pricing data for USDC on



June 21, 2020, as captured by Yahoo! Finance. *See also* page 3 **Exhibit 23**, reflecting the inbound transaction to the Yenamandra Account.

99. The 32,044.80 USDC were commingled with, and traded extensively at a high frequency for, other digital assets within the Yenamandra Account. *See Exhibit 24*, reflecting trading activity volume of approximately 4,000 trades within the Yenamandra Account.

6. *Step 6: Cryptocurrency Transferred from Yenamandra Account to Nguyen Account*

100. In January 2021, the balance of the Yenamandra Account was withdrawn and subsequently transferred to the Nguyen Account. *See ¶¶ 116-118, infra.*

**D. Conclusions Regarding Yenamandra and Nguyen Accounts**

101. Based on (a) my tracing of the Sigma Assets to the Yenamandra Account, coupled with (b) the fact that I have not been able to identify the return by Adaya of any Sigma Assets to Qin or the Receivership Entities, (c) the extensive trading and commingling of the Sigma Assets within the Yenamandra Account, and the (d) final transfers of the Yenamandra Account balance to the Nguyen Account, I have reason to believe that commingled proceeds derived from the Sigma Assets were transferred to and remain in the Nguyen Account.

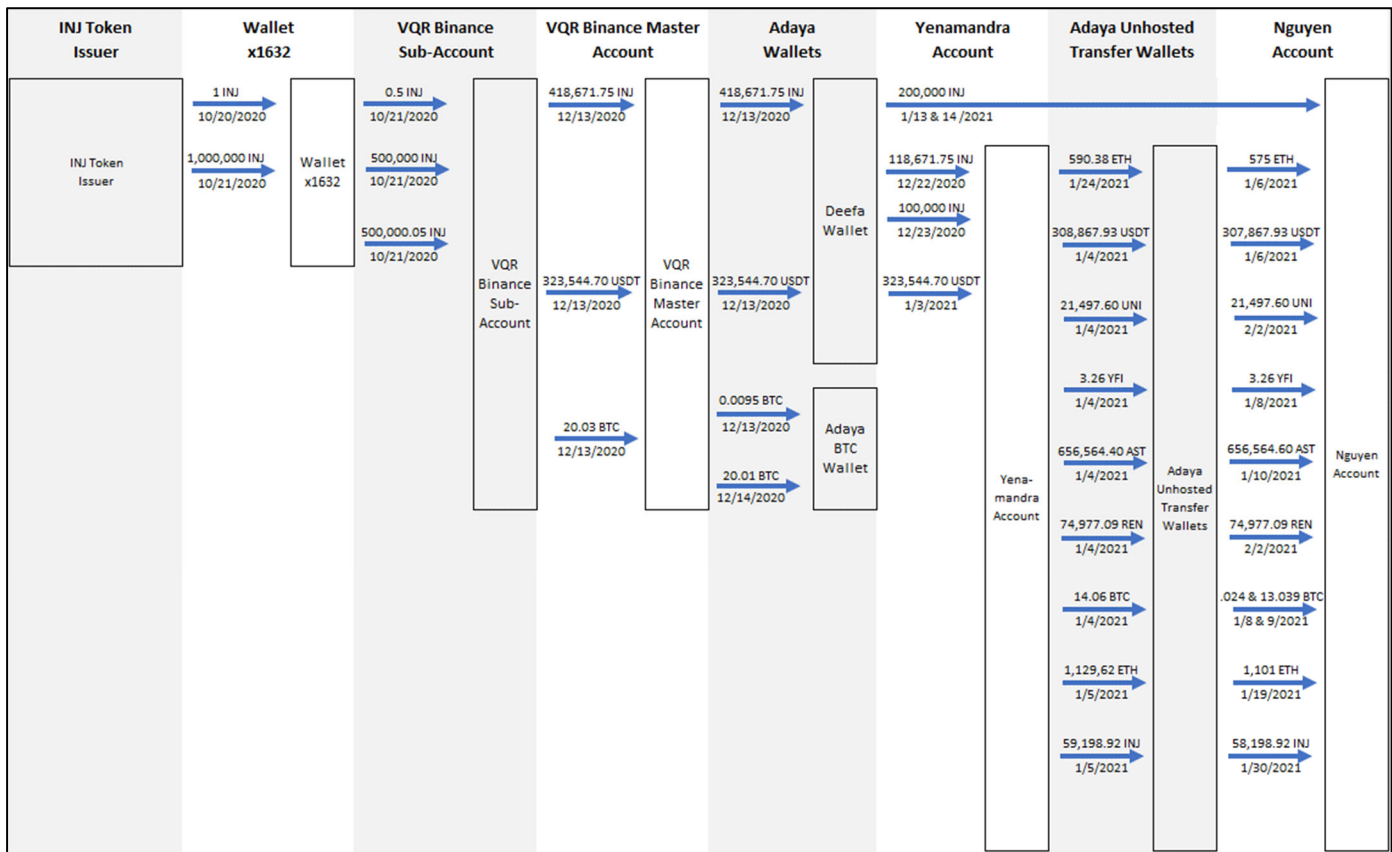
**III. THE VQR ASSETS**

102. The VQR Assets refer to approximately \$3 million dollars' worth of digital assets derived from 990,726.23 Injective Tokens ("INJ")<sup>17</sup> that were transferred from the Receivership Estate to Adaya as follows: (a) 20.3 BTC transferred to Adaya BTC Wallet on December 14, 2020; (b) 218,671.75 INJ and 323,544.70 USDT transferred to the Yenamandra Account between December 22, 2020 and January 3, 2021; and (c) 200,000 INJ transferred to the Nguyen Account between January 13-14, 2021.

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<sup>17</sup> This value was derived from the delta between the 1,000,001 INJ tokens received by VQR in October 2020 and the 9,274.37 INJ returned to Injective Labs between October and November 2020.

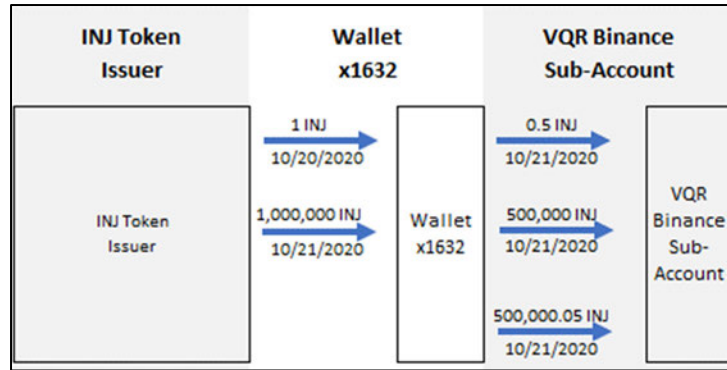
103. As explained in ¶9, *supra*, the VQR Assets can be traced from the Receivership Estate to Adaya in 4 steps: (a) Step 1: INJ tokens deposited into and traded on the VQR Binance Sub-Account; (b) Step 2: trading proceeds transferred from the VQR Binance Master Account to the Deefa Wallet and Adaya BTC Wallet; (c) Step 3: trading proceeds transferred from the Deefa Wallet to the Yenamandra and Nguyen Accounts; and (d) Step 4: proceeds from the Yenamandra Account transferred to the Nguyen Account. The diagram below<sup>18</sup> summarizes this movement of money. See ¶¶ 104-117, *infra* for tracing analysis.



#### A. Step 1: INJ Tokens Deposited and Traded In VQR Binance Account

104. The diagram below illustrates the inbound deposits of INJ tokens into the VQR Binance Sub-Account. The tracing analysis follows in ¶¶ 105-107, *infra*.

<sup>18</sup> For ease in viewing, attached hereto as **Exhibit 60** are true and correct copies of the tracing charts that appear throughout this Declaration in paragraphs 12, 13, 42, 52, and 103.



105. On October 20 and October 21, 2020, an unhosted wallet controlled by Adaya ending in “1632” (“Wallet x1632”), received a total of 1,000,001 INJ tokens in two transactions:

Date	Amount	Transaction Hash
2020-10-20	1 INJ	[REDACTED] 0d8c
2020-10-21	1,000,000 INJ	[REDACTED] ac6c

See INJ transactions broadcast to the Ethereum network on Oct. 20, 2020, 23:14 (UTC) and Oct. 21, 2020, 02:30 (UTC), as captured by Blockchair, true and correct copies of which are attached hereto as **Exhibit 47**.

106. Approximately one hour later, the 1,000,001 INJ tokens were transferred from Wallet x1632 to a deposit address ending in E68D belonging to the VQR Binance Sub-Account in three transactions:

Date	Amount	Transaction Hash
2020-10-21	0.5 INJ	[REDACTED] 1fff
2020-10-21	500,000 INJ	[REDACTED] 49ca
2020-10-21	500,000.5 INJ	[REDACTED] 7cad

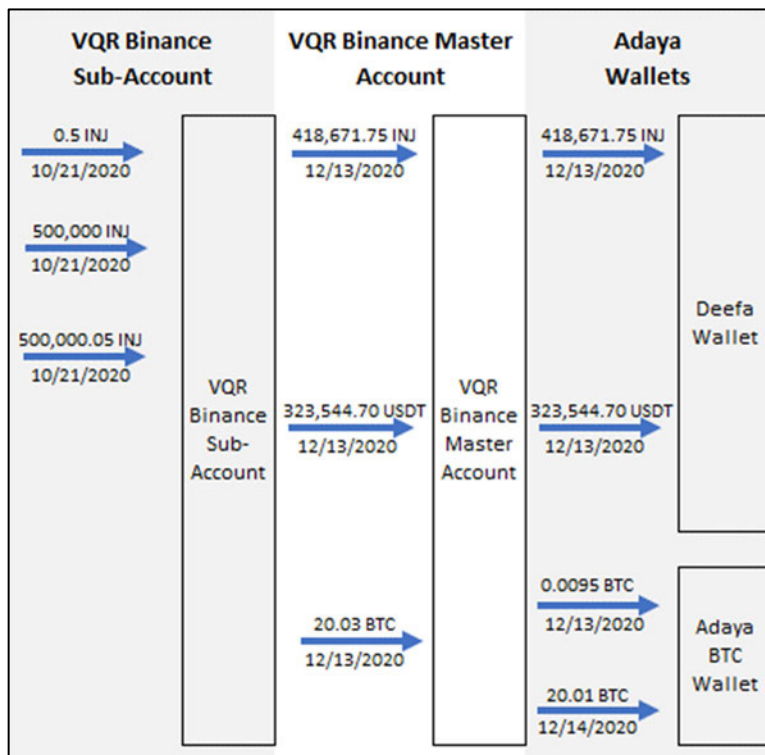
See INJ transactions broadcast to the Ethereum network on Oct. 21, 2020 at 02:28 (UTC), 03:15 (UTC), and 03:33 (UTC), as captured by Blockchair, true and correct copies of which are attached hereto as **Exhibit 48**. See also confirmation emails received by VQR for the inbound transactions, true and correct copies of which are attached hereto as **Exhibit 49**.

107. Between October 21 and December 11, 2020, 581,326.0905 INJ tokens were traded and sold through the VQR Binance Sub-Account at a high-volume and frequency for

other digital assets, including BTC and USDT. This activity resulted in an unsold balance of 418,673.9095 INJ and trading proceeds equaling 323,547.70 USDT and 20.03 BTC.<sup>18</sup> See trading records for the VQR Binance Sub-Account, a true and correct copy of which is attached hereto as **Exhibit 50**.

**B. Step 2: Transfers from VQR Binance Account to Adaya Wallets**

108. The diagram below illustrates the transfer of assets from the VQR Binance Account to the Adaya Wallets. The tracing analysis follows in ¶¶ 109-111, *infra*.



109. On December 12, 2020, Adaya requested that the assets in the VQR Binance Sub-Account be transferred to the Adaya Wallets as follows: (a) INJ and USDT to the Deefa Wallet and (b) BTC to the Adaya BTC Wallet. See Slack direct message between Adaya and

<sup>18</sup> As noted in ¶102, *supra*, during this time 9,274.37 INJ were returned to Injective Labs (“Injective”). These returned tokens are not included in the VQR Assets.

VQR Head Trader, Antonio Hallak, dated December 12, 2020, reflecting the discussion of the above transfers, a true and correct copy of which is attached hereto as **Exhibit 51**.

110. As Binance does not allow direct withdrawals of cryptocurrency from sub-accounts — only the master account can withdraw funds<sup>19</sup> — to execute the requested transfers, the assets were first transferred (a) internally from the VQR Binance Sub-Account to the VQR Binance Master Account and then (b) externally from the Master Account to the Adaya Wallets in the following transactions:

Date	Amount	Tx Hash
2020-12-13	418,671.75 INJ	[REDACTED] 9f99
2020-12-13	323,544.7 USDT	[REDACTED] 9066
2020-12-13	0.0095 BTC	[REDACTED] 254a
2020-12-14	20.021 BTC	[REDACTED] ed5a

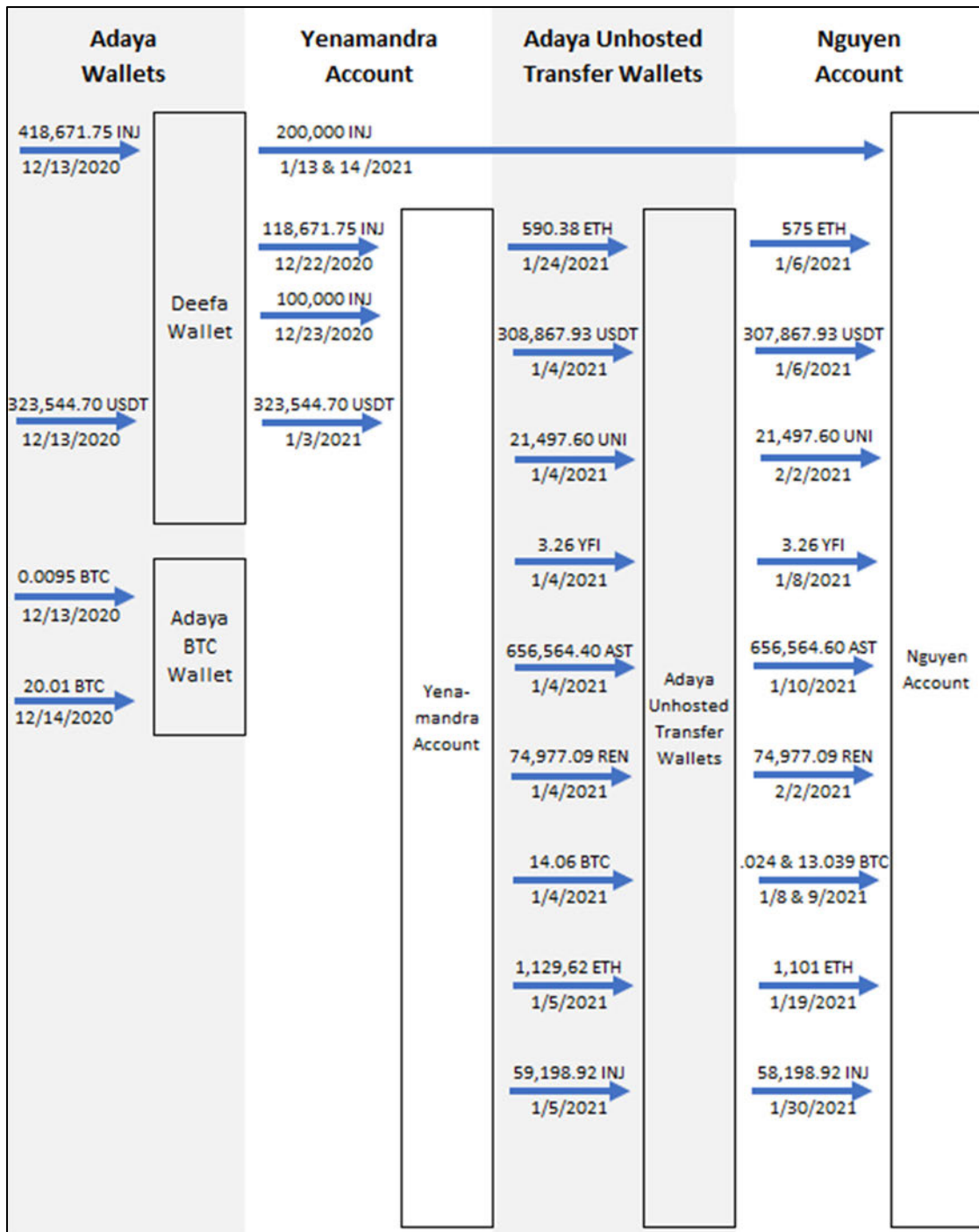
See excerpts from the VQR Binance Master Account Withdrawal History, reflecting the outbound transfers to the Adaya Wallets, a true and correct copy of which is attached hereto as **Exhibit 52**.

111. Since the initial transfer of 20.03 BTC from the VQR Binance Account to the Adaya BTC Wallet on December 13 & 14, 2020, the assets have remained in the wallet, and as of the date of this Declaration, there has been no further activity in the Wallet. See wallet statement for the Adaya BTC Wallet dated December 13, 2020 through June 30, 2023, as captured by Blockchair, a true and correct copy of which is attached hereto as **Exhibit 53**.

**C. Step 3: Transfers From Adaya Wallets to Yenamandra and Nguyen Accounts**

112. The diagram below illustrates the transfer of assets from the Adaya Wallets to the Yenamandra and Nguyen Accounts. The tracing analysis follows in ¶¶ 113-117, *infra*.

<sup>19</sup> See Binance FAQ, available at <https://www.binance.com/en/support/faq/binance-sub-account-functions-and-frequently-asked-questions-360020632811>.



*1. Deefa Wallet to Yenamandra and Nguyen Accounts*

113. Between December 22, 2020 and January 3, 2021, a total of 218,671.75 INJ and 323,544.70 USDT were transferred from the Deefa Wallet to a deposit address for the Yenamandra Account ending in x8409 in the following transactions:

Date	Amount	Tx Hash
2020-12-22	118,671.75 INJ	[REDACTED] 1804
2020-12-23	100,000 INJ	[REDACTED] 1066
2021-01-03	323,544.70 USDT	[REDACTED] 3d9d

See the INJ and USDT transactions broadcast to the Ethereum network on (a) Dec. 22, 2020, 22:29 (UTC), (b) Dec. 23, 2020, 15:38 (UTC), and (c) Jan. 03, 2021, 08:40 (UTC), as captured by Blockchair, true and correct copies of which are attached hereto as **Exhibit 54**. See also excerpts from the Yenamandra Account deposit records, reflecting the above-referenced inbound transfers, a true and correct copy of which is attached hereto as **Exhibit 55**. The approximate U.S. Dollar value for each of the transactions at the time of transfer was (a) \$534,721.49, (b) \$392,187.30, and (c) \$323,711.01, respectively. See pages 13 and 16 of **Exhibit 3**, reflecting the historical pricing data for INJ for December 22-23, 2020 and USDT for January 2-4, 2021, as captured by Yahoo! Finance.

114. Between January 13 and 14, 2021, 200,000 INJ were transferred from the Deefa Wallet to a deposit address for the Nguyen Account ending in 327e in the following transactions:

Date	Amount	Tx Hash
2021-01-13	25,000 INJ	[REDACTED] 771d
2021-01-13	75,000 INJ	[REDACTED] 642e
2021-01-14	100,000 INJ	[REDACTED] 473e

See the INJ transactions broadcast to the Ethereum network on (a) Jan. 13, 2021 00:46 (UTC), (b) Jan. 13, 2021 00:58 (UTC), and (c) Jan. 14, 2021 21:04 (UTC), as captured by Blockchair, true and correct copies of which are attached hereto as **Exhibit 59**; see also page 6 of **Exhibit 58**, which contains true and correct copies of deposit records for the Nguyen Account, reflecting the above-referenced inbound transactions. The approximate U.S. Dollar value for each of the transactions at the time of transfer was (a) \$136,876.65, (b) \$410,629.95, and (c) \$673,334.40, respectively. See page 13 of **Exhibit 3**, reflecting the historical pricing data for INJ for January 12-15, 2021 as captured by Yahoo! Finance.

**D. Step 4: Yenamandra Account to Nguyen Account**

115. Between December 22, 2020 and January 3, 2021, the 218,671.75 INJ and 323,544.70 USDT deposited from the Deefa Wallet to the Yenamandra Account were traded extensively at a high-volume and frequency for other digital assets, including BTC, ETH, and REN. *See* Order History for the Yenamandra Account reflecting the trading activity conducted within the account, which exceed 4,000 trades, a true and correct copy of which is attached hereto as **Exhibit 56**.

116. Between January 4 and January 6, 2021, substantially all of the assets contained in the Yenamandra Account — assets denominated in BTC, USDT, ETH, INJ, Yearn.Finance (“YFI”), Airswap (“AST”), Uniswap (“UNI”), and Ren (“REN”) — were transferred from the Yenamandra Account to wallets ending in “htlu,” “tez2,” 4445,” and “b2a1,” — unhosted wallets believed to be owned and/or controlled by Adaya (collectively the “Adaya Unhosted Transfer Wallets”). These transfers were executed in the following transactions:

Date	Amount	Tx Hash
2021-01-04	0.5 ETH	f8e4
2021-01-04	589.89 ETH	b490
2021-01-04	307,867.93 USDT	f2f2
2021-01-04	21,497.60 UNI	2393
2021-01-04	3.26 YFI	cf17
2021-01-04	656,564.40 AST	1c0a
2021-01-04	74,977.09 REN	14b7
2021-01-04	0.01 BTC	2502
2021-01-04	14.05 BTC	986f
2021-01-05	1 ETH	41d9
2021-01-05	1,128.62 ETH	64b8
2021-01-05	200 INJ	44e1
2021-01-05	58,998.92 INJ	92b5

*See* Withdrawal History for the Yenamandra Account reflecting the above-referenced outbound transfers, a true and correct copy of which is attached hereto as **Exhibit 57**.

117. Between January 6, 2021 and February 2, 2021, virtually identical amounts of BTC, USDT, ETH, INJ, YFI, AST, UNI, and REN were transferred from the Adaya Unhosted Wallets to the Nguyen Account in the following transactions:



Date	Amount	Tx Hash
2021-01-06	5,000 USDT	[REDACTED]2eef
2021-01-06	302,867.93 USDT	[REDACTED]1f83
2021-01-06	575 ETH	[REDACTED]a8ae
2021-01-08	3.26 YFI	[REDACTED]2e83
2021-01-08	0.02 BTC	[REDACTED]5cbf
2021-01-09	13.04 BTC	[REDACTED]9349
2021-01-10	656,564.40 AST	[REDACTED]049c
2021-01-19	1 ETH	[REDACTED]60bb
2021-01-19	500 ETH	[REDACTED]a542
2021-01-19	600 ETH	[REDACTED]ddb1
2021-01-30	59,198.92 INJ	[REDACTED]6d04
2021-02-02	74,977.09 REN	[REDACTED]c0a1
2021-02-02	21,497.60 UNI	[REDACTED]ae75

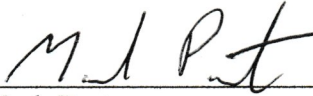
See pages 2-5 of **Exhibit 58**.

#### IV. ACTIVITY IN YENAMANDRA AND NGUYEN ACCOUNTS

118. Between March 11, 2019 and January 3, 2021 (the day before the assets in the Yenamandra Account were transferred to the Adaya Unhosted Wallets), there were approximately 4,000 trades, 100 withdrawals, and 100 deposits within the Yenamandra Account. Between January 6, 2021 (the day the Nguyen Account was opened) until January 17, 2023 (the date Binance produced transactional records to the Receiver), there were approximately 7,000 trades, 100 withdrawals, and 100 deposits within the Nguyen Account, resulting in total assets valued at approximately \$6,061,700. Due to the extensive commingling of crypto assets, coupled with the high volume of trading that occurred in both the Yenamandra and Nguyen Accounts, further tracing of the specific Sigma Assets or VQR Assets and their proceeds would be overly burdensome for the Receiver to undertake without further information. However, based on my review of the transactional records related to the Yenamandra and Nguyen Accounts, coupled with the fact that none of the Sigma or VQR Assets were returned to Qin or the Receivership Entities, I have reason to believe that commingled proceeds derived from the Sigma and VQR Assets were transferred from the Yenamandra Account to, and remain in, the Nguyen Account.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this 3rd day of August 2023.

A handwritten signature in black ink, appearing to read "M. J. Porter", is written above a horizontal line.

Mark Porter